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1 me -- I just want to be clear on the record -- to
2 execute all of these purchases, keep a formal
3 accounting, knowing that I had no financial experience,
4 unpaid?

5 MR. HARRISON: Objection. Compound.

6 THE WITNESS: No. I'm going to clarify. I
7 expected you to keep an accounting of any of the trades
8 and the transactions that you were doing, and I did not
9 realize the extent of the transactions you were doing.
10 And when you look at what you did after January through
11 to the time we got the wallets back, there were so many
12 unauthorized transactions, it's mind boggling how -- I
13 could never have anticipated that. You were a friend.
14 You said you were -- decided to do it. You wanted to be
15 part of this. It was -- it was -- you know, it was an
16 exciting thing for you. It was your rabbit hole. It's
17 just what you were doing all day long. It wasn't a big
18 deal. You're thrilled to do it. Opens opportunities
19 for you.

20 It wouldn't occur me you wouldn't think that
21 you didn't need to keep an accounting. And had I known
22 that, of course I never would have left things with you;
23 and I certainly wouldn't have had you trading if I
24 thought you were just doing it without keeping an
25 accounting. I mean, it makes sense now because you

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1 never were forthright. You never -- it was very
2 difficult getting anything from you; and when we did, it
3 was woefully inadequate.

4 BY MS. RICHARDSON:

5 Q. And -- and woefully inadequate based on what?

6 A. Based on --

7 MR. HARRISON: Objection. Vague.

8 THE WITNESS: There was a lot missing.

9 BY MS. RICHARDSON:

10 Q. Uh-huh.

11 A. The finder's fee wasn't even in any of the few
12 ledgers -- the few accounting sheets that you gave us.
13 And according to the crypto experts, the custodians,
14 when they looked at it they -- they were of the opinion
15 it was incredibly inaccurate. We never knew quite how
16 inaccurate because the finder's fee wasn't even in it.

17 Q. So I think --

18 A. That was a separate wallet.

19 Q. I think we can both agree that it was -- it
20 was -- it was a mess.

21 A. That's definitive, yes.

22 Q. Okay.

23 A. It was an absolute disaster. "Mess" is a very
24 kind way to put it.

25 Q. Based on what we just discussed, is it

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1 reasonable to assume -- let's just keep the money off
2 the table for a moment. I know, you're getting a glare.

3 A. It's okay. No, I'm not, actually. It's fine.

4 Q. Okay. You have established that I was one of
5 your closest friends. I want to ask you, were you aware
6 that -- that you were certainly one of my closest
7 friends during that time -- prior to that time?

8 A. Yeah.

9 MR. HARRISON: Okay.

10 THE WITNESS: I would have -- I -- I guessed --
11 I supposed so.

12 BY MS. RICHARDSON:

13 Q. Is it fair to assume that when I realized --
14 how do I put it?

15 Can you understand that it would be -- is it
16 reasonable to assume that the pressure of the trades and
17 the falling market may have had an impact on my work
18 product?

19 MR. HARRISON: Objection. Calls for
20 speculation.

21 BY MS. RICHARDSON:

22 Q. You yourself have said that I became a version
23 of me that you didn't recognize -- correct? -- during
24 this time?

25 A. Yes.

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1 Q. Is it fair to say that I became somewhat
2 reclusive and different after I started doing the crypto
3 trading?

4 A. In my -- in my recollection, once we hit
5 November, December, January, when I informed you that we
6 wanted the wallets back, then you started to become
7 very, very -- very elusive -- very elusive and -- and
8 your responses were -- were not -- were not that -- were
9 not very adequate and forthcoming.

10 Q. Were you aware that I was like that with
11 everybody and not just you during that time?

12 A. No.

13 MR. HARRISON: Objection. Calls for
14 speculation.

15 Go ahead. That's fine.

16 THE WITNESS: Sorry. I couldn't have been
17 aware.

18 BY MS. RICHARDSON:

19 Q. No. That's fine.

20 A. I wasn't with you.

21 Q. Did it ever occur to you that this period of
22 time could have had a psychologically damaging impact on
23 me?

24 MR. HARRISON: Objection. Calls for
25 speculation. Assumes --

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1 DEPOSITION OFFICER: I'm sorry?

2 MR. HARRISON: I'm sorry. Objection. Calls
3 for speculation. Assumes evidence not in the record.

4 I -- I apologize. I've been speaking low sort
5 of all day. Have you been able to hear me or --

6 DEPOSITION OFFICER: As long as everybody's not
7 talking at the same time.

8 MR. HARRISON: Is there a question? Can you
9 repeat the question.

10 BY MS. RICHARDSON:

11 Q. Is it reasonable to assume that these chain of
12 events could have had a significant psychological impact
13 on me?

14 MR. HARRISON: Objection. Calls for
15 speculation. Assumes facts not in evidence.

16 BY MS. RICHARDSON:

17 Q. You still have to answer.

18 A. There's a lot of chains of events. Can you
19 clarify.

20 Q. Okay.

21 A. Can you -- can you --

22 Q. Sure. Let's go one by one.

23 A. It's such a long time frame. Can you bring it
24 down --

25 Q. You --

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1 A. -- narrow it.

2 Q. -- meant a great deal to me; and at a time when
3 the world had changed and my circle was very small, is
4 it reasonable to assume that losing you and Madeleine
5 would have had a impact on -- on -- on me, in and of
6 itself?

7 MR. HARRISON: Objection. Compound question.
8 Calls for speculation.

9 THE WITNESS: I -- I -- I cannot -- I cannot --
10 I cannot accurately answer that because, obviously, I'm
11 not you; but also, when I look back on all of the --
12 your actions since November on, it -- you also
13 weren't -- you weren't the person that I thought you
14 were.

15 BY MS. RICHARDSON:

16 Q. Tell me --

17 A. So --

18 Q. That's -- that's a good point.

19 So tell me about what those actions were --
20 the -- in your perception.

21 MR. HARRISON: I'm sorry. What actions are we
22 talking about?

23 MS. RICHARDSON: The ones she just referred to.
24 My actions from --

25 THE WITNESS: I --

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1 MR. HARRISON: From November on?

2 MS. RICHARDSON: Uh-huh.

3 THE WITNESS: Talking about, like, all --
4 all -- all -- the multiple trades, the ducking and not
5 giving our wallets back, which we were doing a
6 significant amount of trades from the time we started to
7 ask for them. We got no accounting, no wallets back.
8 This went on until finally -- finally you surrendered
9 them. And even then, the codes were wrong.

10 There's -- I would have thought the old Ashley
11 would have taken these things hard, but you were not
12 that person from -- to me, your actions -- I hadn't seen
13 you and been exposed to you, but your actions are not
14 actions that I would have characterized as even been
15 remotely like -- like you were the person I knew. It
16 seemed like it was -- because you weren't the person I
17 knew, you -- you know -- you know, you took a hidden --
18 a hidden kickback, and you never told me.

19 There's -- it wasn't -- you weren't -- I guess
20 I was thrown off base. So I could not presume how you
21 would have taken, say, losing me as a friend at that
22 time --

23 BY MS. RICHARDSON:

24 Q. At --

25 A. -- because you weren't acting like a friend

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1 from your actions.

2 Q. Okay. At any point from November to --
3 November 2021 until we last communicated, did you have a
4 conversation with me about these concerns?

5 A. The conversation I had was that we wanted to
6 get the wallets back and I needed the numbers and the
7 accounting for my taxes. In January you gave us
8 something, but the tax season was coming up, and it
9 still went on and on with -- with no accounting, no
10 wallets returned. It was awkward, and it was clear that
11 this -- that everything was not what I had thought it
12 was.

13 Q. Did it ever occur to you that I did not realize
14 that I was expected to do the accounting and that I did
15 not have it?

16 MR. HARRISON: Objection. Calls for
17 speculation. Compound question.

18 THE WITNESS: When you were asked for the
19 accounting and you gave a -- as I would say, a woefully
20 inadequate one finally in January and things were
21 missing, I would have thought, knowing that we wanted
22 the wallets back and I needed them back, that we need an
23 accounting, it would have been the moment to coordinate
24 a hand-over, as Saffery's had wanted, and let people try
25 to get a handle on how much was where and, whoa, how

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1 much, what price, where it was staked, which coins,
2 rather than just keep trading, keep trading -- even
3 after wallets were returned, still trading.

4 BY MS. RICHARDSON:

5 Q. Do you --

6 A. It doesn't -- it doesn't connect.

7 Q. Do you --

8 MR. HARRISON: Ms. Richardson, we've been going
9 for about an hour after lunch. Can we take a break?

10 MS. RICHARDSON: Can I just finish up this --

11 MR. HARRISON: Sure.

12 MS. RICHARDSON: If you -- if you need to -- I
13 feel like we're right -- I just want to ask this one
14 question before I forget.

15 BY MS. RICHARDSON:

16 Q. Do you remember we went to dinner in -- you
17 might not remember this. It was the last time we went
18 to dinner. It was in January of 2022, and I offered to
19 give you the wallets, and you said no. I'm -- I'm --
20 you were about to travel -- I -- I had -- I had said I
21 could give you the wallets then; and you said, No. They
22 should stay with you.

23 We discussed that?

24 A. No.

25 Q. Okay.

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1 A. No. Because Saffery's wanted the wallets.
2 They wanted an accounting. They didn't just need the
3 wallets. They needed passcodes. And an accounting
4 would have been nice, but at least wallets and codes --

5 Q. Do you --

6 MR. HARRISON: You got to get her finish her --

7 MS. RICHARDSON: Okay.

8 THE WITNESS: At least wallet codes would have
9 been I think the start for them in a perfect world and
10 an accounting so that they knew what they were looking
11 at and weren't having to play hide and seek with them.

12 BY MS. RICHARDSON:

13 Q. And you do not remember me saying to you in
14 January of 2022 that I would give you the wallets there?

15 MR. HARRISON: Asked and answered.

16 BY MS. RICHARDSON:

17 Q. Okay.

18 A. Yeah, no, I didn't. Because I had told you in
19 November we wanted them and you reacted rather strangely
20 to that, which seemed odd to me. And then it took a
21 very long time -- months -- six months to get the
22 wallets back from you --

23 Q. Do you --

24 A. -- with a lot of trading, transactions and --
25 unauthorized transactions in the meantime.

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1 Q. Are you aware that from -- the first time I
2 received any request about the physical wallets was in
3 March of 2022, when Lieh reached out to me and that I
4 said I would be happy to give them to you; we probably
5 should spend a week reviewing things because it's very
6 complicated.

7 Were you aware that we had that discussion?

8 MR. HARRISON: Objection. Compound.

9 BY MS. RICHARDSON:

10 Q. Were you aware that reached -- Lieh reached out
11 to me in March of 2022 about the wallets?

12 A. The actual date, I would have to look up; but I
13 asked -- Lieh knew that I was getting nowhere with you,
14 and Saffery's was getting -- nobody could get any
15 information out of you; and so as the head of the
16 financials, he stepped in to try to see if he could
17 figure it out and retrieve these wallets.

18 Q. Are you aware that between our dinner and
19 January of 2022 and that email I received from Lieh,
20 nobody reached out to me about the wallets?

21 A. I'm not aware of that, no.

22 Q. Okay. Between the dinner we had in January of
23 2022 and the email I received from Lieh, nobody reached
24 out to me about the wallets.

25 MR. HARRISON: Is that -- wait. Wait. There

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1 is no question right now. It's just a statement, so --

2 MS. RICHARDSON: Yeah, it's a statement; but
3 I'm asking if she's aware of that.

4 MR. HARRISON: She can't -- she just answered.
5 Asked and answered.

6 THE WITNESS: No.

7 BY MS. RICHARDSON:

8 Q. Are you -- are you aware that the communication
9 I did receive was from Jack about providing money for
10 your taxes?

11 MR. HARRISON: Objection. I don't even think
12 that states --

13 THE WITNESS: I need to see it.

14 MR. HARRISON: -- the email correctly.

15 THE WITNESS: I need to see it.

16 MS. RICHARDSON: I'm happy to --

17 THE WITNESS: I -- I do recall, at one point,
18 like I said, Jack reaching -- everybody was trying to
19 get information for taxes, and I think he -- he was
20 trying to let you know that we needed information
21 because tax season was just around the corner, and you
22 still hadn't given us any information, so they
23 couldn't -- the accountants were -- it's a lot of
24 complicated accounting -- my -- my income tax. It's not
25 just, like, this -- this was a significant --

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1 significant amount of stuff to start unwinding.

2 BY MS. RICHARDSON:

3 Q. Understood.

4 A. Yeah.

5 Q. So if you look at the chain of events, we met
6 and I offered to give you those crypto wallets --

7 A. Which, as you say, I don't recall.

8 Q. I received several emails from Jacks [phonetic]
9 and -- and basic questions about accounting but also
10 about getting a large amount of money to pay your taxes.

11 The next correspondence I received about the
12 wallets was from Lieh in late March of 2022. I
13 responded to him immediately, said I would be happy to
14 do that. I can fly to Toronto, or are you coming here?
15 Because at -- the idea of them moving without a person
16 didn't seem smart. At that point Lieh said, We'll
17 figure it out. You know, he -- I could -- we can -- I
18 can pull up the communication, if you would like, but --
19 but there was a -- there was a gap in the time period.

20 Now, the next time -- nobody reached out to me
21 after that about the wallets. You arrived at my house
22 unannounced in April of 2022.

23 Do you remember that?

24 MR. HARRISON: Okay. That was so compound,
25 like, I have forgotten what the beginning of the

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1 question was.

2 MS. RICHARDSON: That's fair.

3 MR. HARRISON: There was so many -- a
4 recitation --

5 MS. RICHARDSON: There was --

6 MR. HARRISON: -- of a whole history. There is
7 no real question there. There is no way she can answer.

8 MS. RICHARDSON: I asked her -- and I should
9 have had you say it on the record. I asked her if she
10 was aware of that timeline.

11 THE WITNESS: I'm -- I'm -- I want to answer
12 some of your questions --

13 BY MS. RICHARDSON:

14 Q. Please. Please.

15 A. -- as it comes.

16 You're saying that we had this dinner where you
17 offered me the wallets and that was after November.

18 Well, because in November I knew I wanted the wallets
19 and your reaction was definitely off. If you had had
20 dinner with me and said, I'm going to give you these
21 wallets, I would have taken those wallets. Wouldn't
22 matter where I'd fly, and they would have gone with me.
23 Someone could have flown to me and gotten them because I
24 knew we needed the wallets wall back.

25 But we also needed the codes -- the correct

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1 passcodes, not the reversed one you gave when we finally
2 got them. But that was very important. And if Lieh --
3 if -- you know, if Lieh reached out to you in March, the
4 wallets should have been returned pretty quickly. But
5 it seemed -- we took a long time getting them from you.

6 And the reason I showed up to your doorstep is
7 because, if you may recall, that's the time when you
8 were saying you were up in Northern California,
9 specifically, you said you were dealing with the house.
10 And then you were missing phone calls. You said you
11 were at the hospital with anaphylactic shock. All the
12 time we could see that you were staying in Venice Beach
13 at your house.

14 Q. And how was that?

15 A. Because you had shared your location. So we
16 could see that you were lying and that when you said you
17 were up in Northern California, we could see you hadn't
18 moved.

19 And so when I got off that plane, I went to
20 your house, if you might recall. The first thing you
21 said was -- obviously, you were shocked.

22 You said, You wouldn't believe the saga. I was
23 on my way up north at 2:00 in the morning. Something
24 happened. I had to turn around.

25 Because you were sitting in Venice and you

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1 were -- had written the night before that you were in
2 Salinas; right?

3 So at that point it was -- it was an obvious
4 circus. And as I said, because of your tracking, we
5 could see that you were blatantly lying to avoid showing
6 up for -- for phone meetings with -- with Saffery and
7 literally, you know, complying.

8 Q. Right before you came to my house, do you
9 recall that we did have a phone meeting with Saffery?

10 A. Yeah, we did.

11 And then you said, I have to go now. I have to
12 start driving out to Northern California.

13 You were, like, immediately going to go to
14 Northern California. We saw you, like, sitting there.
15 You never left.

16 And then I got off plane the next day, you
17 still -- you hadn't left. And then I dropped by your
18 house; and then you're like, Oh, I was -- in the middle
19 of the night -- I was up there at 2:00 in the morning.
20 I turned the car around, and I had to come back.

21 Then you said the next day you would bring the
22 wallets over after you did something to them, and that's
23 when I got the wallets. Not all -- I don't believe I
24 got all. Did I ever get all?

25 Q. When you came -- when you came to my house that

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1 day -- this is really important -- did you ask for the
2 wallets?

3 A. Yeah. Yeah.

4 And you were like, Okay. Fine. I'll bring
5 them over tomorrow. I don't have them ready now. I've
6 got to do something.

7 And then tomorrow you came over to Santa
8 Monica.

9 Q. Isn't it true that you came over to my house
10 and you actually didn't ask for wallets, you -- you
11 said, Oh my God. I wanted to see you, and I said,
12 you're here. I'm bringing the wallets over?

13 A. Because you knew that we wanted the wallets. I
14 was also trying to be cool because I was very mindful
15 that you could have just taken off to Tahiti because you
16 had not only the wallets, you had the codes. You were
17 the only one with the codes.

18 Q. So you thought that I was going to take off to
19 Tahiti --

20 A. I wouldn't have known -- I wouldn't have
21 presumed, but what -- I did know that I was having to be
22 very, very cool so I actually did get the wallets
23 because we'd been wanting the wallets for months.

24 Q. Now --

25 A. At that point it was -- I don't remember.

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1 It -- was it April, May, June. It was a --

2 Q. It was April.

3 A. -- long time later.

4 Q. It was a long time later from when?

5 A. From when we originally started to try to get
6 the wallets --

7 Q. Okay.

8 A. -- and from when I'd originally told you I
9 wanted the wallets back, which was November.

10 MS. RICHARDSON: So I think this would be a
11 good time for a break that you wanted to have --

12 MR. HARRISON: Okay.

13 MS. RICHARDSON: -- and then we'll circle back.

14 THE VIDEOGRAPHER: Going off the record at
15 3:37.

16 (A recess is taken.)

17 THE VIDEOGRAPHER: We are back on the record at
18 3:48. This is Media No. 4 in the deposition of
19 Ms. Taylor Thomson.

20 THE WITNESS: Okay.

21 BY MS. RICHARDSON:

22 Q. In March of 2022 I received a series of text
23 messages from your daughter, Madeleine.

24 Were you aware of that text message exchange?

25 A. I -- I -- I do know that she did send you some

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1 texts at some point.

2 Q. And she said in those text messages that she
3 was upset because of what I had done to Mother.

4 Do you know what she would be referring to?

5 A. I would think that's something you'd have to
6 ask her.

7 Q. Was I close with Madeleine over the years of
8 our friendship?

9 MR. HARRISON: It calls for speculation.

10 But you can answer, if you can.

11 THE WITNESS: You were close to both Madeleine
12 and I.

13 BY MS. RICHARDSON:

14 Q. And when you used to go away at times for
15 different reasons, if Madeleine had a problem, could you
16 count on me to show up for her?

17 A. I always felt that I could count on you. I
18 trusted you.

19 Q. Do you think that I cared about Madeleine?

20 A. I -- I think you did. My -- I mean -- I think
21 you did to a certain extent. I think there's also --
22 turns out in hindsight there is also some agenda there,
23 but I couldn't presume to say exactly what. But I just
24 don't think it's exactly what I thought it probably was.

25 Q. And when you say that it turns out there was

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1 some agenda there, can you elaborate on -- on what you
2 mean.

3 A. I mean, I think at the end -- the end -- the
4 last trip you did with her, she -- she started to feel
5 somewhat used by you, so --

6 Q. And --

7 A. -- probably just in the fact -- undoubtedly
8 disappointed.

9 Q. Can you -- can you explain where that
10 disappointment came from.

11 MR. HARRISON: Objection. Calls for
12 speculation.

13 BY MS. RICHARDSON:

14 Q. Okay. You -- you -- you just spoke to my
15 having an agenda; and that's something that was also
16 spoken to a "Wall Street Journal" about me, that -- that
17 you should have seen signs that I had an agenda all
18 along.

19 Does that sound familiar?

20 MR. HARRISON: Sorry. What --

21 THE VIDEOGRAPHER: Your mic.

22 MR. HARRISON: Oh, sorry. I'm sorry.

23 Objection to form. Vague. I don't know what
24 you mean by "Does that sound familiar?"

25 ///

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1 BY MS. RICHARDSON:

2 Q. You just spoke about I was close to her but now
3 it's clear there's an agenda. I --

4 A. I said there might have been. I said it wasn't
5 definitive, but I said that I cannot tell now -- I said
6 I could not definitively answer now -- equivocally
7 answer.

8 Q. And why is that?

9 A. Because your -- all of your actions over the
10 last -- since -- since the beginning of this crypto were
11 not, in my opinion, genuine.

12 Q. And --

13 A. There was -- there were things that went on
14 that seemed and are, in my opinion, disingenuous.

15 Q. Can you elaborate on what those things would
16 have been.

17 A. The first one that comes to mind would have
18 been the secret commission with the hidden fee. That
19 was never -- that was never revealed. The first person
20 I heard that from was Tushar in July 12th, 2022. That
21 was a long time after that money had been sent to your
22 wallet. That's truly disingenuous, in my opinion.

23 And the fact that you didn't surrender the
24 wallets, disingenuous. You wouldn't give us an
25 accounting -- well, you now profess that you were

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1 incapable. But what you did give us was inaccurate, and
2 you knew it was inaccurate because you didn't include
3 the finder's fee.

4 And -- and everything that unfolded afterwards.
5 The fact that you would not surrender the wallets and
6 that you started lying to avoid having to even deal with
7 us. It's -- it all was, to me, disingenuous. And of
8 course there is an agenda behind all of that. There
9 was.

10 And you were doing unauthorized trades for
11 months. You know, after the last authorized trade -- I
12 don't know when it was. Maybe January. It was not --
13 you know, a few trades I authorized; and everything else
14 were then -- hundreds of thousands of crazy risky trades
15 that -- that I hadn't authorized.

16 I mean, all of that just seemed not in
17 integrity to me.

18 Q. Okay. And --

19 A. That's a starting point, for sure.

20 And then, of course, then you come down to the
21 tax. And then if you really want to get down to it, you
22 come down to this litigation with these, you know,
23 ridiculous assertions. You know, tried to get you to
24 leave Michelle for me; you know, that, like, I defamed
25 you. Right? That's -- intentional infliction of

Page 215

1 emotional distress?

2 I mean, all of these things -- this is -- talk
3 about disingenuous. I mean, how do you think that your
4 texts made me feel? That's intentional emotional
5 distress.

6 Q. So text messages that I sent you when I was
7 financially, emotionally, physically, and mentally
8 destitute, begging you to kill me, in your mind was
9 intentional infliction of emotional distress to you?

10 A. Well, you sent them. I didn't -- I didn't send
11 them to myself. I mean, I couldn't take it any other
12 way but personally --

13 Q. Right.

14 A. -- and -- and be -- you know, be on edge, be
15 unnerved and, you know, arguably somewhat frightened for
16 not just myself, but also for you and your safety. I --
17 to me, you wrote them and you sent them.

18 Q. And did it ever --

19 A. That's not me inflicting it. That's you
20 inflicting it.

21 Q. At any time from 2021 to the time that you
22 received those text messages, did it ever occur to you
23 that what you asked me to do may have had a catastrophic
24 impact on my life and that it may have hurt me quite
25 possibly even more than you?

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1 MR. HARRISON: Objection to form.

2 THE WITNESS: And to clarify, you offered. You
3 were excited to do this crypto in the beginning, and you
4 were in your element, and you were in your -- in your
5 field because at that point you had really -- you had
6 become, as you fancied yourself, an authority because
7 that's all you did.

8 Your career, your new life force, direction was
9 this -- this altcoins, which was something you were so
10 knowledgeable about. It's -- you know, I don't -- I
11 don't see that this was, like, that -- ultimately, it
12 didn't work out well, as you can see; but during the
13 process, I don't know when it would have -- it
14 probably -- when it really went sideways was when you
15 were asked to surrender the wallets. I'm sure at that
16 point it probably was stressful for you because you knew
17 that you'd misappropriated so much money at that point.

18 BY MS. RICHARDSON:

19 Q. But -- and how was that money misappropriated?
20 Did -- did you perceive that I personally -- because I
21 know that in January -- June of -- let me rephrase this.

22 In June of 2022 I received a letter alleging
23 that I had committed theft to the tune of millions of
24 dollars. So was that your perception at that point,
25 that I had stolen the money?

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1 MR. HARRISON: Objection. Vague.

2 I'm not sure I understand what the question is
3 or the reference.

4 BY MS. RICHARDSON:

5 Q. You just said yourself that my actions were
6 untoward. I am asking for you to explain what that
7 means.

8 A. I think when --

9 MR. HARRISON: Asked and answered.

10 She explained it.

11 THE WITNESS: When you -- under the guise of
12 saying you're going to manage my crypto and then you
13 take it and you start sending it sideways to your own
14 wallets and you start doing unauthorized trading on your
15 own and then you're asked to surrender the wallets and
16 give them back, which was at a point where we could have
17 salvaged some money, but instead you just duck
18 everything and then you keep trading and you do more
19 adventurous and riskier trades and then you just proceed
20 to basically piss everything away. Pardon my language.
21 Sorry.

22 You basically just gambled away the rest of my
23 crypto. It was -- what am I meant to think and how am I
24 meant to feel about that when I thought you were one of
25 my best friends? And I trusted you. The only mistake

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1 that I made was trusting you --

2 BY MS. RICHARDSON:

3 Q. And so --

4 A. -- as a friend. I just -- could have never
5 fathomed this situation.

6 Q. So your interpretation was that there was a
7 series of events where I first defrauded you and then
8 lied to you over a period of time.

9 Is that fair to -- is that a fair assumption?

10 MR. HARRISON: Objection. Asked and
11 answered --

12 MS. RICHARDSON: Okay.

13 MR. HARRISON: -- characterization.

14 BY MS. RICHARDSON:

15 Q. So these allegations, Ms. Thomson, you can
16 understand are extremely serious; correct?

17 MR. HARRISON: Objection.

18 Which allegations are we talking about?

19 MS. RICHARDSON: I think that -- all of the
20 ones she just laid out, that -- that I was willfully and
21 willingly withholding information, that I lied, that I
22 misappropriated funds, was one of the words she used.

23 BY MS. RICHARDSON:

24 Q. So those are -- those are -- those are fairly
25 serious allegations.

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1 Do you agree?

2 MR. HARRISON: Calls for speculation.

3 But you can --

4 THE WITNESS: It's speculation, but it's
5 obvious. They're pretty serious. Those -- those
6 offenses -- those are the offenses that they are, and
7 that is serious. In my opinion, that's very serious. I
8 mean, I don't know if someone else might perceive that
9 as not but --

10 BY MS. RICHARDSON:

11 Q. And --

12 A. -- that's pretty serious to me.

13 Q. And you are aware at this point they are still
14 allegations, are you not?

15 A. Ah, yes. Because --

16 MR. HARRISON: Objection. Calls for a legal
17 conclusion.

18 I don't really understand your question.

19 MS. RICHARDSON: It doesn't call for a legal
20 conclusion.

21 BY MS. RICHARDSON:

22 Q. There's -- these are -- are these -- these are
23 very serious allegations that you are saying about me.

24 And do you know the difference between a
25 allegation and a fact?

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1 MR. HARRISON: Objection. Calls for a legal
2 conclusion --

3 THE WITNESS: Yes --

4 MR. HARRISON: -- speculation.

5 THE WITNESS: -- objection.

6 MR. HARRISON: I don't really get the point of
7 this.

8 BY MS. RICHARDSON:

9 Q. Ms. Thomson, can you understand that -- let
10 me -- let me take this a step back.

11 When this was happening did you discuss it with
12 Madeleine?

13 MR. HARRISON: Objection. Vague.

14 I don't -- what's "this"? When you --

15 THE WITNESS: "This." What's "this"?

16 BY MS. RICHARDSON:

17 Q. When -- when you just gave me a series of
18 allegations that included misappropriation of funds, a
19 secret kickback that was not disclosed, and failure to
20 produce accounting; correct?

21 A. That's pretty well what's in the -- what's in
22 my motion.

23 Q. Right.

24 A. That's in our complaint. Everything is already
25 published in the complaint.

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1 Q. Understood. Prior to that did you discuss
2 these allegations with your daughter, Madeleine?

3 MR. HARRISON: Prior to -- objection. Vague.
4 BY MS. RICHARDSON:

5 Q. Sorry --

6 A. Prior to the complaint?

7 Q. Did you -- no.

8 Just in general, have you discussed these
9 allegations with your daughter, Madeleine?

10 A. My daughter lives with me, and she is in the
11 world where she knew what was going on, and it's
12 everything in the complaint.

13 Q. So the answer is -- is yes or no?

14 A. Well, it would be like you discussing something
15 with Michelle when she was living with you.

16 Q. Right.

17 A. Pretty obvious.

18 Q. And --

19 A. You're going to speak to your partner. And
20 she's living in my house, and she's not an idiot.

21 Q. And did you discuss these things with Ron
22 Murphy [phonetic]?

23 MR. HARRISON: Objection. Vague.

24 BY MS. RICHARDSON:

25 Q. Did you discuss --

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1 A. Sorry. Which things --

2 Q. Yeah. The allegations against me --

3 A. -- are you talking the complaint?

4 Q. Did you discuss the allegations against me with
5 Ron Murphy?

6 A. Ron Murphy knows what's in the complaint --

7 Q. Did you discuss --

8 A. -- which is exactly what I just told you.
9 Everything that I told you is in the complaint, the
10 hidden fee --

11 Q. Uh-huh.

12 A. -- the -- the funds being traded
13 unauthorized --

14 Q. Uh-huh.

15 A. -- it's all in the complaint --

16 Q. Uh-huh. And --

17 A. -- right?

18 And so yeah, he knows what's in the
19 complaint -- what's in the complaint. It's public --
20 it's filed.

21 Q. Right. And that that complaint was -- and did
22 you -- did you talk to Catherine Hardwicke about the
23 events that took place and the allegations against me?

24 A. I saw Catherine Hardwicke in London, and your
25 name came up in passing and just wondering -- she hadn't

Page 223

1 seen you. She hadn't spoken to you because she said she
2 had written to you and you hadn't been responding. And
3 I said I hadn't seen you in a long time.

4 Q. And --

5 A. And so I said we weren't -- we weren't talking,
6 which was pretty obvious, because we weren't --

7 Q. And did you tell her why?

8 A. -- because you -- yeah. I said you -- all I
9 said was you were managing my crypto because I trusted
10 you and -- and I bought a coin, which, unbeknownst to
11 me, you had a secret commission, and hadn't seen you in
12 a long time. I don't remember when that was but --

13 Q. And did you discuss these allegations with
14 Kevin Fitzgerald and Rand Rusher?

15 A. Kevin -- Kevin because you know Kevin from
16 being on a boat, and you also convinced Kevin to invest
17 where I believe Kevin wants money too.

18 Q. Uh-huh.

19 A. So he -- he spoke to me about the fact that
20 he'd -- that you'd convinced him to go into this
21 investment and you lost a lot. So your name came up.

22 Q. And how -- how did I -- how did I convince
23 Kevin to invest in Persistence?

24 A. Well, I think you would know that because
25 you're the one that did it. But we all know -- everyone

Page 224

1 was around -- that you were -- you were trying to -- you
2 were trying to sell it to anybody; right? You tried to
3 sell it to Ron. He wisely, of course, did not bite.
4 But K.J. bought some.

5 Q. And when you say I tried to sell it --

6 A. You were promoting it.

7 Q. How was I promoting it?

8 A. Well, you know very well. You were speaking of
9 it -- just like you were with me. You know, that you
10 had an inside track with the company, you knew Tushar,
11 you were go -- doing all these meetings with him and you
12 knew all these things about the company and how
13 wonderful the company was and it's, like -- how it's
14 going to flourish and -- you know, it's -- you were
15 generally enthusiastic, and you were enthusiastic to
16 everybody that was around. We were on a boat
17 together --

18 Q. So you're saying --

19 A. -- right?

20 Q. -- I was -- I was excited about it; right?

21 A. Yes. You were excited about it; so, you
22 know -- K.J. got into it too. You didn't force him to,
23 but he got in because he was -- he believed -- he
24 believed everything that you said about it --

25 Q. Did I --

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1 A. -- the company.

2 Q. Did I force you to?

3 A. No. Of course you didn't force me to. I
4 just -- I just, like -- I just listened to your advice,
5 to your -- to your -- to everything you knew about the
6 company and how positive it seemed and how the staking
7 was going to be -- what? -- 35 percent minimum and it
8 could never go down. The worst that could happen would
9 be that it wouldn't go up. I mean, there was -- like,
10 it was -- it was very -- it was a very rosy situation.

11 Q. And I think --

12 A. Anyone would have been -- anyone would have
13 been piqued about that.

14 Q. And I think it's fair to say that I was excited
15 about it?

16 A. You were very excited about it.

17 Q. And I think it's fair to say that you were
18 excited about it back then?

19 A. Absolutely.

20 Q. And I think that you also told a number of
21 friends about it; is that correct?

22 A. I told friends I'd made an investment in this.

23 Q. Uh-huh. And that you were excited about it?

24 A. Well, it's implicit if you make an investment,
25 you're usually excited about something.

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1 Q. Right. Do you think that maybe that was
2 similar to what I was experiencing when I told you about
3 it?

4 MR. HARRISON: Objection. Calls for
5 speculation.

6 THE WITNESS: Yeah. I wouldn't be able to
7 presume. And also, the difference is you took a secret
8 kickback, which, you know, you didn't do with anyone
9 else, obviously. You were buying -- they were going,
10 buying on the open market. You know, that was the
11 difference.

12 BY MS. RICHARDSON:

13 Q. And that secret kickback that you allege that I
14 took -- how do you see it -- how do you see that secret
15 kickback having been realized or benefiting my life, in
16 general?

17 MR. HARRISON: Objection. Vague. Calls for
18 speculation.

19 I don't even know what that means.

20 THE WITNESS: It's a speculation, yeah.

21 BY MS. RICHARDSON:

22 Q. Are you aware that I never received any
23 payment, financial benefit, or -- of any kind at any
24 time throughout this process?

25 A. I don't know what became of -- of the -- the

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1 hidden finder's fee. I -- I didn't -- I didn't track
2 what you ended up getting, if you got -- when you got it
3 but -- but it was -- it was meant to happen. And as you
4 know, they had your wallet number to send it to. So I
5 think you did, I guess. You did get it. Because Tushar
6 sent it to you. Persistence sent you -- your wallet
7 that you controlled the secret -- the secret commission,
8 the hidden kickback.

9 Q. So you are -- you are saying that you have no
10 memory of the conversation we had about setting aside a
11 small amount of tokens to be realized after a year with
12 yours, if you were in profit?

13 MR. HARRISON: Asked and answered. Objection.

14 THE WITNESS: The -- no.

15 What I remember very, very distinctly is that
16 we spoke about -- we spoke about -- about the -- the --
17 them offering you a commission. Wasn't hidden. You
18 said, They offered me a commission. I absolutely turned
19 it down. I told them no. Just make sure you give
20 Taylor the best price. That was what you came back and
21 said, the best price --

22 BY MS. RICHARDSON:

23 Q. Really?

24 A. -- was \$5.

25 Q. And so just so we're --

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1 A. And many months later you mentioned in passing
2 that they happened to offer you, in thanks, in
3 gratitude, a few tokens. A few tokens. That was
4 Persistence. After the deals had happened. And that
5 seemed fine with me because that wasn't -- that wasn't
6 coming out of my -- that wasn't coming out of my
7 purchase price. And it also did not affect -- it would
8 not have affected if you -- your objectivity if it had
9 been just a token after the fact as opposed to a payment
10 behind the scenes before -- before I -- I decided to
11 close the deal.

12 Q. I -- I believe the conversation about the few
13 tokens that you're referring to was in relation to their
14 liquid staking platform that happened later on, once you
15 had your Persistence and it was being liquid staked.

16 A. The conversation -- I don't know in which
17 tokens that they were giving you. You just mentioned at
18 dinner once that they had -- oh, by the way, they --
19 they said that they wanted to give me some tokens as a
20 thank you, which of course seemed fine to me because I
21 knew that you negotiated the best price -- or I thought
22 you negotiated the best price for my deal, not that you
23 had already taken a fee that was embedded in the price.

24 Q. So there was a pretty substantial discount that
25 you received at the time of your purchase in August of

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1 2021; correct? You could -- you would agree to that?

2 A. I don't know what the discount was, but that's
3 not what we're talking about. We're talking about the
4 secret kickback which took away from the objectivity,
5 which, if I had known, as you know, because you know
6 me -- if I had known that it existed, I wouldn't have
7 done the deal --

8 Q. Okay. But --

9 A. -- and you wouldn't have made the money --
10 whatever you made off what -- that \$6 per -- per token.

11 Q. So are you -- are you aware that I never made
12 any money off of any transaction that happened with your
13 cryptocurrency and --

14 MR. HARRISON: Objection. Vague. Asked and
15 answered.

16 THE WITNESS: I have -- I have no idea what
17 that --

18 BY MS. RICHARDSON:

19 Q. Are you -- are you aware that in the course of
20 my helping you with your cryptocurrency, in fact, it was
21 quite the opposite? I lost all of -- all -- any and all
22 remaining assets and then I was forced to sell my home
23 when you began to threaten legal action against me?

24 A. Because you --

25 MR. HARRISON: Objection. Compound. Calls for

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1 speculation. Calls for evidence that's not in the
2 record --

3 BY MS. RICHARDSON:

4 Q. You can still --

5 MR. HARRISON: -- evidence that's not in the
6 record.

7 BY MS. RICHARDSON:

8 Q. -- answer.

9 Ms. Thomson, when you purchased Persistence you
10 mentioned earlier that I helped negotiate the deal; is
11 that correct?

12 A. You -- you controlled the entire deal. You
13 negotiated with Tushar, with Persistence. You -- you
14 alone. You negotiated with Dechert. You negotiated
15 with the deal with Dechert. Everything, you did; and it
16 was you solely, yes.

17 And so you negotiated the price with -- with
18 Persistence and -- and that's why you also had the
19 opportunity to instruct Tushar to make sure that he
20 didn't put the commission into the contract and instead
21 to leave it out of the contract and to send the
22 commission straight to you.

23 And you didn't tell the lawyers because Dechert
24 never knew. Because if they'd known, I'm sure they
25 would have put in the contract. And I suspect that

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1 Persistence never talked to Dechert because had they
2 done that, Persistence would undoubtedly have told them
3 about the commission and then my lawyers would have --
4 would have brought that to -- would have put in the
5 contract; I would have noticed it and walked away from
6 the deal.

7 All of that you knew because you knew me very
8 well, having been to art fairs, how I take to people
9 doing something behind my back as opposed to, as you
10 say, being an art dealer who is in the business and they
11 sell something, you know there is a profit, as opposed
12 to someone negotiating -- pretending to get me the best
13 price and then you find they went around the corner and
14 said, Okay. Give me a slice.

15 It's very different.

16 Q. I agree with you. I -- I think that that would
17 be incredibly untoward, which -- if it had happened.

18 Let's go back for a moment to the time period
19 when the price and the deal was being done. Do you
20 recall that during that time period we were together
21 physically almost every day?

22 MR. HARRISON: So a couple things. Compound
23 question, over and over again. Many, multiple parts to
24 that compound question.

25 MS. RICHARDSON: Let me rephrase it.

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1 MR. HARRISON: There is also some testimony in
2 there before the question.

3 MS. RICHARDSON: Let me -- let me -- let me
4 rephrase the question. Withdrawn.

5 BY MS. RICHARDSON:

6 Q. In August of 2021 you were in Los Angeles for
7 the majority of the month. During that time, do you
8 recall me being at the house with you and us spending
9 almost every day together?

10 MR. HARRISON: Objection --

11 THE WITNESS: I don't recall almost every day.

12 MR. HARRISON: Before you answer -- objection
13 to compound. Part of it was just testimony.

14 But go ahead.

15 BY MS. RICHARDSON:

16 Q. Do you recall --

17 A. I do not -- I do not recall the -- the
18 frequency. I know you were around, you were at the
19 house. You even in those days had, I believe, the code
20 to get in and let yourself in. That was before we
21 changed the codes.

22 Q. Are -- are you aware that the only time I went
23 to your Santa Monica home when you were not at the house
24 was by your instruction to check on Raquel's being there
25 and doing work?

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1 A. I'm not aware when I was not in the house. I'm
2 aware when we were in the house --

3 Q. Okay.

4 A. -- that you used to just show up unannounced --

5 Q. I --

6 A. -- quite regularly.

7 Q. Oh, okay.

8 A. It just --

9 Q. Are you aware --

10 A. -- was what it was.

11 Q. -- that during the transactions with
12 Persistence, at every stage I was communicating with you
13 the terms and that I suggested you hire an attorney so
14 that you were protected?

15 A. I recall distinctly that you did negotiate the
16 terms, which is why we ended up with you negotiating
17 with Tushar and putting your 6-cent commission into --
18 not into the contract and not into writing and directly
19 instructing him to just send it to you and that you also
20 didn't tell the lawyers, which I would have thought you
21 would have want to have something that significant -- if
22 you were standing to make almost a million dollars out
23 of a deal, I would have thought -- especially if you
24 thought I was such a difficult person with anybody who
25 was involved in financial transaction, you would

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1 definitely wanted to have that in writing somewhere,
2 especially obviously in the contract, have the lawyers
3 put it in.

4 Q. Ms. Thomson, can I ask you a question?

5 Do you know the difference between a realized
6 and an unrealized gain?

7 A. Not with the -- that's not what's at issue
8 here. The issue is, was there a hidden kickback and a
9 secret commission --

10 Q. Ms. Thomson --

11 A. -- or not?

12 Q. -- you are here in a court-ordered deposition,
13 and I'm asking you a question --

14 A. Of course I know the difference.

15 Q. Do you know difference between --

16 MR. HARRISON: Objection. Argumentative.

17 She's been asking and answering all of your
18 questions.

19 BY MS. RICHARDSON:

20 Q. Do you understand the difference between a
21 realized and an unrealized gain?

22 A. Yes.

23 Q. Do you understand a conditional agreement?

24 A. Yes.

25 Q. Do you understand that the money that was

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1 transferred to the wallets during that purchase were all
2 in my custody?

3 A. Yes. But all those wallets I knew about.
4 We -- I had no visibility into your personal wallet,
5 which is where the kickback was sent to.

6 Q. Do you remember -- you -- you -- Ms. Thomson,
7 are you aware that there was, in fact, no secret
8 kickback at any time?

9 A. No.

10 MR. HARRISON: Objection. Asked and answered.

11 THE WITNESS: Asked and answered.

12 BY MS. RICHARDSON:

13 Q. Ms. Thomson --

14 A. Pretty well explained that one.

15 Q. When --

16 A. If it were, you -- would have been in writing
17 somewhere. There's nowhere where this is in writing.

18 Q. That is because --

19 A. You said I sat -- I went to a dinner alone with
20 no witnesses and you told me there's -- they've decided
21 to give me -- they want to give me this; but then you
22 still thought it was necessary, of course, to tell
23 Persistence to make sure they kept it out of the
24 contract.

25 Q. Do you have proof that I realized gains?

1 MR. HARRISON: Objection --

2 THE WITNESS: That's not what I'm talking
3 about.

4 MR. HARRISON: -- asked and answered.

5 BY MS. RICHARDSON:

6 Q. No. Do you -- I'm asking you a question.

7 You have made very serious allegations about
8 me; so I want to ask, do you know for a fact that I
9 realized a profit from your Persistence transaction?

10 A. You've misunderstood. We're speaking about a
11 secret hidden fee, kickback. It's -- we're not speaking
12 about whether it was realized or not.

13 Q. And --

14 A. Two different things completely.

15 Q. And is it your --

16 A. I have no idea what you did realize. I know
17 some things did go your way. I don't have the
18 accounting in front of me.

19 Q. And is it your --

20 A. I don't know exactly what you got --

21 Q. -- understanding and belief that I was doing
22 that in a way that was untoward and planned on keeping
23 that for myself?

24 A. Why else would you have it sent to your
25 personal wallet that only you controlled, that nobody --

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1 that we didn't know about?

2 Q. I believe I controlled all of the wallets.

3 But, Ms. Thomson, do you remember --

4 A. And why would you have told Tushar not to
5 just -- not to let me know, not to put it in our
6 contract?

7 Q. Are you saying that at some point I told Tushar
8 not to let you know about that?

9 A. Well, you told Tushar not to put it in the
10 contract --

11 Q. Why do you think that --

12 A. -- to write the price down as \$5.00, not 4.94,
13 and that you would just keep that between the two of
14 you.

15 Q. Did I -- did I at some point say to Tushar that
16 we would keep it between the two of us?

17 A. I have to look at the --

18 MR. HARRISON: Objection. Asked and answered.
19 Calls for speculation.

20 MS. RICHARDSON: I'm asking --

21 MR. HARRISON: Calls for speculation.

22 DEPOSITION OFFICER: One at a time.

23 MR. HARRISON: Calls for speculation.

24 THE WITNESS: I need to see the texts -- the
25 texts between you Tushar. Will you pull that out?

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1 BY MS. RICHARDSON:

2 Q. I -- I think they're somewhere here in this
3 pile, if you would like to look for them. But that's
4 not what I'm asking you right now. When we get back to
5 that question, you are welcome to go through it and --
6 and --

7 A. I don't need to go through that.

8 Q. I can tell you that that was never said. I can
9 also tell you that --

10 MR. HARRISON: Objection. You can't just
11 testify.

12 MS. RICHARDSON: I understand. I --

13 MR. HARRISON: You can't just testify --

14 DEPOSITION OFFICER: Okay. One at a time.

15 MR. HARRISON: -- deposition.

16 BY MS. RICHARDSON:

17 Q. I think we would both agree that -- for very
18 different reasons that it was a major oversight that
19 nothing was ever memorialized that could have been
20 perceived as an upside for me; correct?

21 MR. HARRISON: Objection --

22 MS. RICHARDSON: Okay.

23 MR. HARRISON: -- to form.

24 BY MS. RICHARDSON:

25 Q. Let me -- let me go back for a second and say

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1 this. You've already established that you do not
2 remember me having a conversation with you that there
3 could be a conditional upside for this transaction. And
4 I want to make it clear that when I ask you this, you
5 don't have any memory of -- of there being something
6 that was conditional based on you receiving profit; is
7 that correct?

8 MR. HARRISON: Objection. It's --

9 MS. RICHARDSON: Okay.

10 THE WITNESS: -- question.

11 MR. HARRISON: -- many questions there, many
12 parts to that question. I don't even understand it.

13 BY MS. RICHARDSON:

14 Q. Ms. Thomson, I -- is it clear to you that I
15 spent a large amount of time helping you with your
16 crypto transactions?

17 MR. HARRISON: Objection to the question --
18 form of the question. Vague.

19 BY MS. RICHARDSON:

20 Q. We've established that for -- for months, if
21 not the better part of a year, I was working full-time
22 custodying, trading, and trying to help you with your
23 cryptocurrency; correct?

24 MR. HARRISON: Objection to form. Compound.

25 You can try and answer.

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1 THE WITNESS: It was very, very clear --
2 because everything is tracked; it's on the blockchain --
3 that you were -- you were trading and transacting for
4 an extremely long time. Once we hit a certain period,
5 whether it was January, February, very early, you
6 weren't transacting for me because you were doing
7 unauthorized trades that were not -- were not instructed
8 by me --

9 BY MS. RICHARDSON:

10 Q. And --

11 A. -- at all and would never have been instructed,
12 trades that I wouldn't even have begun to believe
13 either -- to even understand because they were so risky.

14 Q. And your --

15 A. So you weren't doing that for me.

16 Q. Well --

17 A. Because how could you be doing that for me when
18 you basically were just throwing millions and millions
19 of my dollars away --

20 Q. Do you --

21 A. -- repeatedly?

22 Q. Do you remember us discussing that when the
23 crypto market was going into a negative, that you would
24 want to create a hedge or create some way to offset your
25 losses?

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1 A. No.

2 Q. Okay. Do you recall at any point in time
3 giving me any concrete guidelines with how to manage
4 your cryptocurrency?

5 MR. HARRISON: Objection. Asked and answered.

6 You can try and answer as best you can.

7 THE WITNESS: Yes. You were -- you were -- you
8 were meant to purchase certain coins; and from what I
9 understood, you were going to be staking many of those
10 coins and doing what you said you would do with those
11 coins. That was obvious for some of them, like the ones
12 that we discussed, the ones that you have in texts.

13 But all the -- the adventuresome, risky trades
14 that came months and months later, when you were
15 avoiding responding to us, that was not anything that
16 you were communicating with me, nor that I'd instructed.

17 BY MS. RICHARDSON:

18 Q. And that understanding you just expressed --
19 was it based on a written understanding that we had?

20 A. As you know, we don't -- we did not have any
21 specific contract.

22 Q. Okay. Now, let's go back for a moment to the
23 conversations you had with -- you were saying -- we left
24 off on Kevin Fitzgerald and Rand Rusher, Catherine
25 Hardwicke. Are you aware that Catherine and I have

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1 worked together in the past --

2 A. No.

3 Q. -- on multiple projects?

4 A. No.

5 Q. Okay. Are you aware of the impact these
6 allegations would have on our shared friend circle?

7 MR. HARRISON: Objection. Vague. Objection.
8 Calls for speculation.

9 THE WITNESS: We don't have a shared circle.

10 BY MS. RICHARDSON:

11 Q. We don't?

12 A. The only shared friend we have is Cat -- the
13 only shared friend we have.

14 Q. Really?

15 A. I don't know any of your friends. My friends
16 are my friends. They're not your friends. And if you
17 have a problem with the fact that they -- that they
18 don't reach out to you now, they -- since this was all
19 published, a lot of people now know that there was a
20 problem.

21 Q. I think that happened far before it was
22 published. I think that -- I think that this happened
23 in 2022, and the lawsuit was filed in -- not filed until
24 2023 and -- and during that time period, there was a
25 very strong shift from mutual friends. We did have

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1 quite a few mutual --

2 A. We had no --

3 MR. HARRISON: Wait. Wait. There's no
4 question here, just a long string of testimony from
5 Ms. Richardson.

6 MS. RICHARDSON: All right.

7 MR. HARRISON: So if you have a question, pose
8 a question.

9 BY MS. RICHARDSON:

10 Q. There were several years, Ms. Thomson, where
11 you were not speaking to Ron Murphy, was there not?

12 A. No. Ron and I always communicate. It's just
13 that Ron is extraordinarily busy, and Ron's been doing
14 back to back shooting for a very long time.

15 Q. There was a period from 2017 to 2020 where I
16 saw Ron multiple times without you and he expressed
17 great sadness at the loss of your friendship.

18 Do you recall that?

19 A. Makes no sense. No. Of course not.

20 Q. Okay.

21 A. Have to get Ron to address that.

22 Q. Yes, we will.

23 Were you aware that in November of 2019 your
24 daughter was having a lot of anxiety and -- do you
25 remember that time period?

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1 A. I don't -- I would have to look at a calendar
2 and try to peg exactly when.

3 Q. There was a time period where you were having
4 to stay with her and you wanted to go to London and so I
5 went to Canada to be with her so that you could go to
6 London. Do you remember that trip?

7 A. I vaguely remember something like that.

8 Q. Okay. Madeleine had not seen Ron in several
9 years; and because I was in Toronto, I wanted to see
10 Ron; so we saw him together.

11 Are you aware of that?

12 A. Oh, yeah. Yeah, Ron told me.

13 Q. I want to go back again and reiterate the point
14 you made earlier, which is we have no mutual friends.

15 So are you stating that Ron was not my friend?

16 A. Yes.

17 Q. And Madeleine was not my friend?

18 A. She was your friend until she felt betrayed.

19 Q. And she felt betrayed --

20 A. But Ron was never your friend.

21 Q. Ron was never my friend?

22 A. No.

23 MR. ANDRE: Thank you.

24 BY MS. RICHARDSON:

25 Q. And the time I spent with Ron without you --

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1 how would you explain that?

2 MR. HARRISON: Objection. Vague.

3 BY MS. RICHARDSON:

4 Q. Okay. Let's -- let's -- let's switch gears for
5 a moment and go back to Beau.

6 How did you meet Beau St. Clair?

7 A. I met Beau -- I don't remember how I met Beau.

8 Q. Do you remember telling me that you met Beau
9 St. Clair at Dr. Hourani's office?

10 A. Yeah. I was going to say, I met him --
11 exactly. Yeah.

12 Q. And do you remember what Dr. Hourani told you
13 about Beau?

14 A. No. But she -- I have no recollection of what
15 she told me about Beau. I just remember meeting Beau
16 there and we got along extremely well.

17 Q. You've told me and several others in the past
18 that Dr. Hourani told you you should meet Beau; she's a
19 really cool lesbian.

20 A. Beau is not a lesbian. And no, I don't
21 remember that. Beau and I met in getting a -- an IV.
22 We were both in the IV room sitting beside each other.

23 This is, like, absolute made-up nonsense. I
24 would imagine I would have remembered that because Beau
25 became one of my best friends, and Beau was married to

1 Lloydie, and Beau was not gay.

2 Q. I -- I am aware of that, but let's just go back
3 for a minute.

4 That's why it was a funny story, because
5 what -- what happened next was Beau invited you to go to
6 Venice, Italy, didn't she?

7 A. At some point I did go. When Lloyd was filming
8 she was going out to visit; and yeah, I went out with
9 Beau to visit Lloydie on the set and basically to hang
10 out with Beau because he was shooting all day.

11 Q. You have no recollection of telling myself and
12 others multiple times a very -- a story we all found
13 very funny, including Beau, that you went to Venice
14 having no idea that Beau was married?

15 A. Because -- yes. Because when I'd met Lloyd
16 before, I thought he was her business partner because
17 they were just very calm and cool together. They did
18 not read like a married couple.

19 Q. Isn't it true that you told many of us that you
20 went on that trip believing that it was actually a date?

21 A. No.

22 Q. You never said that?

23 A. That's nonsense. No. I went --

24 Q. You never said that to me or anyone else?

25 A. -- because I was going with somebody who was

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1 like a friend because she was -- she was like, Come to
2 Venice. Why wouldn't I? To go hang out, have fun in
3 Venice, and be -- see that -- see the film. It was fun.

4 And I was just surprised that they were
5 married, and I actually felt badly that I -- because
6 Lloyd had not seen Beau for a while, and it meant --
7 when they went to dinners and that I was there. So I
8 felt like I'd not given them their alone time; but Beau
9 she was like -- she goes, No. It's fun. I want to hang
10 out.

11 Q. Do you --

12 A. You're making up all this stuff about her --

13 Q. I'm -- I'm making it up --

14 A. -- and gay.

15 Q. Okay. I think --

16 A. Just along with your stuff about making passes
17 at you or leaving Michelle, all of that.

18 Q. Are you aware that there were a number of
19 people that you told that you had a romantic attraction
20 to Beau St. Clair?

21 A. No. Beau was one my dearest friends. I adored
22 Beau --

23 Q. I -- I --

24 A. -- as one adores a very good friend.

25 Q. I am very well aware of that. And -- and --

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1 and they are not mutually exclusive.

2 A. That's not the case. Beau was a good friend.

3 Q. Do you remember expressing to me on multiple
4 occasions that you had a physical and romantic
5 attraction to the recording artist LP?

6 A. No.

7 MR. HARRISON: Are you serious right now?
8 Like, are you serious --

9 THE WITNESS: No.

10 MR. HARRISON: -- with this line of
11 questioning? You've got to be kidding me.

12 THE WITNESS: No.

13 BY MS. RICHARDSON:

14 Q. No?

15 A. No.

16 Q. Do you have any recollection of you expressing
17 to me a physical and romantic interest in Jessica
18 Bendinger?

19 A. No. In fact, I vaguely recommend -- recollect
20 -- or -- was she the one that you were trying to sell
21 one of her investments --

22 Q. No.

23 A. -- that we met at the hotel?

24 Q. But I do believe --

25 A. Then I don't know who she is.

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1 Q. -- that one of -- one of the
2 mischaracterizations you have been telling people was
3 that that was the case, she was a friend and she had a
4 business and you met her and --

5 A. Jessica?

6 Q. Yes.

7 A. Where did I meet her, and what was her -- I
8 don't even remember her. Obviously, not that memorable.

9 Q. Okay. Let's go for a moment to 2019. I was
10 having trouble with my relationship; and during that
11 time, we spent more time alone together because it was
12 just the two of us instead of the three of us.

13 Do you remember that?

14 MR. HARRISON: Objection.

15 THE WITNESS: I remember when Michelle had an
16 affair on you and you didn't see her as much. So, I
17 mean, if that -- you were over for dinner, it would
18 be -- at Nobu, it would be without Michelle.

19 BY MS. RICHARDSON:

20 Q. Do you remember --

21 A. Because I don't know -- I don't remember how
22 long it took before you took her back.

23 Q. Do you remember that during that time period we
24 went to The Rolling Stones concert?

25 A. Uh-huh. I didn't recall that that's when

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1 Michelle was out of the -- was out of the picture; but I
2 remember going to The Stones, yes.

3 Q. Yes. It was during that time. It was in
4 August of 2019.

5 And do you remember kissing me on the lips
6 after that concert?

7 A. No.

8 Q. You don't?

9 A. No.

10 Q. Okay. Do you remember that because we were
11 drinking I slept over and you wanted me to sleep in your
12 bed and I slept in the guest room?

13 MR. HARRISON: What -- what -- what's the
14 question? I don't understand what this line of
15 questioning is about.

16 MS. RICHARDSON: Let's go back.

17 MR. HARRISON: -- harassment --

18 MS. RICHARDSON: This is not harassment.

19 MR. HARRISON: -- and this -- the question
20 didn't even make sense.

21 MS. RICHARDSON: In September --

22 MR. ANDRE: Object -- object to the form of the
23 question as vague --

24 MR. HARRISON: Yes.

25 MR. ANDRE: -- compound. Ambiguous.

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1 MS. RICHARDSON: That's fine.

2 MR. HARRISON: Much better.

3 BY MS. RICHARDSON:

4 Q. In September of 2019 we took a trip to
5 Victoria, BC.

6 Do you remember that trip?

7 A. Yes.

8 Q. Okay. We arrived -- and I can't remember the
9 name of the hotel, but we stayed in Victoria for the
10 first few days while we looked at houses for Madeleine.

11 Do you remember that?

12 A. Yeah.

13 Q. And do you remember that we had a hotel suite
14 with one king bed that we shared?

15 A. Well, it wasn't very memorable -- the --
16 what -- whether -- what room we were in, et cetera.
17 Didn't occur to me whether -- it's not a recollection
18 whether you had your room, whether I had a room of my
19 own.

20 Q. But it's -- it's -- you remember that there
21 were multiple occasions where we would share a bed on
22 trips?

23 A. I don't say multiple. We shared once on the
24 crossing at Italy because I -- you wanted -- you were
25 going to take another room, and there was no room that

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1 the point, and I think we were waiting for a guest to
2 leave, and you were going to stay longer. You were
3 extending your trip, if I recall. The only way it
4 worked was to, like, have one night crashing in my room.

5 Q. Actually, I stayed in your room for, I think,
6 five nights because you asked me to stay on and then
7 you --

8 A. So then we didn't have a room for you.

9 Q. No.

10 MR. ANDRE: Wait for her to finish the
11 question, if she's actually asking a question.

12 Ms. Richardson, you are testifying and not
13 asking questions --

14 MS. RICHARDSON: I understand.

15 MR. ANDRE: -- oftentimes, so --

16 MS. RICHARDSON: I will -- I will work on that.
17 I apologize.

18 BY MS. RICHARDSON:

19 Q. When we went to -- do you remember our trip to
20 Jamaica in 2017?

21 A. Yes. Yes.

22 Q. We stayed in the -- oh, gosh -- the villa on
23 the property -- the -- that belonged to the person who
24 wrote -- the Fleming Villa -- the Fleming Villa; is that
25 correct?

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1 A. Yes.

2 Q. And that property had a main house and two
3 guesthouses on the property.

4 Do you remember that?

5 A. I remember there was -- there were several
6 accommodations. There was the -- the master main house,
7 and then there were some other -- other suites. I don't
8 remember.

9 Q. And on that trip it was you --

10 A. I let you share my room.

11 Q. On that trip it was me and you and then
12 Madeleine and her boyfriend at the time -- correct? --
13 the four of us total?

14 A. Correct.

15 Q. And is it correct that we had the entire Ian
16 Fleming Villa for the duration of that stay to
17 ourselves?

18 A. Yes.

19 Q. And do you remember that when we arrived at the
20 villa and I went to put my things in the guest room, you
21 told me I couldn't sleep in there?

22 A. It probably wasn't very good, and I don't know
23 that everything even had air-conditioning. I don't
24 know, but it wasn't -- it definitely wouldn't have been
25 nice like the master. Obviously, I was being nice to

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1 you. You're a friend. You're a girlfriend.

2 Q. And you told me to use that bathroom and keep
3 my clothes in the closet but that I had to sleep with
4 you because you were going to have to spend more money
5 if I slept in the bed?

6 MR. ANDRE: Objection. Compound.

7 Again, Ms. Richardson, if you want to ask her
8 questions, but to testify is not --

9 BY MS. RICHARDSON:

10 Q. Do you remember -- do you remember telling me
11 to keep my clothes in that closet in the middle bedroom?

12 A. I -- I do remember you had your clothes in
13 another bedroom, and I don't know why. Probably was
14 in -- because my bed -- the master was actually my room,
15 would have had my clothes in it.

16 Q. Do you remember --

17 A. And it was obviously much easier.

18 Q. Do you remember telling me after we arrived
19 that if I were to sleep in that bed, you would have to
20 pay more money?

21 A. Ah, I think they were -- they maybe were
22 charging per -- exactly. Then we would have been taking
23 another -- another accommodation.

24 Q. So --

25 A. Yeah.

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1 Q. -- I could use that bed --

2 A. But you could have slept in it, if you wanted.

3 But a -- I had the master. Much more fun if you -- like

4 with a good girlfriend -- a friend, why wouldn't you

5 want to, like, hang together? But you had a choice.

6 You could have. You could have chosen that. You could

7 have said, I don't want to sleep in your room.

8 But we were good friends.

9 Q. We were good friends.

10 And when we were in Victoria, BC, in 2019, we

11 were looking at houses with Madeleine; and we were

12 standing outside waiting for Madeleine; and you told me

13 that you thought that I should leave Michelle and how --

14 how great it would be, I could just hang out with you

15 more and we could hang out together and how great -- how

16 much better my life would be.

17 Do you have any recollection of that

18 conversation?

19 MR. ANDRE: Objection. Vague. Compound.

20 Form.

21 THE WITNESS: I recollect telling you once

22 again -- because it wasn't the first time. You've been

23 told many times -- because our opinion was we thought

24 were better than her, that you should be leaving

25 Michelle and that you deserve better. Nothing to do

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1 with me. Nothing to do with me. I don't want to insult
2 your feelings but --

3 BY MS. RICHARDSON:

4 Q. No. That's okay.

5 A. -- not interested.

6 Q. That's totally --

7 A. Not interested. Not my lane. Not interested.

8 Q. Not your lane.

9 So you're saying that you have not had romantic
10 attractions to women?

11 MR. HARRISON: Objection for obvious reasons.

12 MS. RICHARDSON: Okay.

13 MR. HARRISON: Just -- but go ahead. You can
14 answer. I mean, just -- I don't even know what to say
15 at this point.

16 THE WITNESS: Because it's a ridiculous
17 question. It's a ridiculous question. Of course not.
18 No. No.

19 I don't know where you're going to go with
20 this. You've already, like, got -- like, sold something
21 to the press, like --

22 BY MS. RICHARDSON:

23 Q. I'm -- I'm asking --

24 A. -- you want to try to get some more, like --
25 some more, like, you know, stories made up, few more

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1 lies? Doesn't make them true.

2 Q. Ms. Thomson, are you aware that I'm certainly
3 not the only person you spoke to about this? There is
4 multiple --

5 MR. HARRISON: Objection. Objection.

6 THE WITNESS: That's wrong.

7 MR. HARRISON: Enough. Enough. I mean, that's
8 not even a question. Objection to the form. You're
9 testifying again and, frankly, just making stuff up.

10 MS. RICHARDSON: I asked -- I asked --

11 MR. HARRISON: Let's take a break. Let's take
12 a break for a few minutes.

13 MS. RICHARDSON: Okay. Okay.

14 MR. HARRISON: This is ridiculous.

15 THE VIDEOGRAPHER: Going off the record at
16 4:42.

17 (A recess is taken.)

18 THE VIDEOGRAPHER: We are back on the record at
19 five o'clock. This is Media No. 5 in the deposition of
20 Ms. Taylor Thomson.

21 BY MS. RICHARDSON:

22 Q. Okay. We're going to change lanes for a
23 moment, which I'm sure nobody will be mad at.

24 In November of 2021, while you were in London,
25 you became friends with the founder of the

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1 cryptocurrency Tezos; correct?

2 A. She was an acquaintance. She was -- she and
3 her husband were friends of a friend. We were
4 acquaintances.

5 Q. And did she introduce you to Saffery's?

6 A. I don't believe so.

7 Q. I remember --

8 A. I can't remember.

9 Q. -- around that time --

10 A. I don't remember.

11 Q. -- you were wanting -- we both -- you and I had
12 talked several times during that time. Ironically, I
13 had said I was concerned about your accounting; and you
14 had asked me to try to find you an accountant.

15 Do you remember that?

16 MR. HARRISON: Objection. Testifying.

17 BY MS. RICHARDSON:

18 Q. Do you remember asking me --

19 MR. HARRISON: Compound multiple times --

20 BY MS. RICHARDSON:

21 Q. Do you remember asking me in the fall of 2021
22 to help you to find an accountant who understood
23 cryptocurrency?

24 A. I don't recall the exact time, but I do
25 remember having a conversation with you where I wanted

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1 to find a crypto accountant.

2 Q. And do you remember that one of the challenges
3 was that it had to be someone who understood the
4 Canadian -- who understood the Canadian tax system?

5 A. I don't recall that fact.

6 Q. Okay. Do you recall that when you were in
7 England you had a meeting set with a firm who was going
8 to potentially help you with your cryptocurrency?

9 MR. ANDRE: Objection. Vague.

10 THE WITNESS: Yeah. I don't recall.

11 BY MS. RICHARDSON:

12 Q. Let me ask you this.

13 When was your first meeting with Saffery?

14 A. I don't recall.

15 Q. Okay. You hired Guidepost Solutions to help
16 you understand and recover lost cryptocurrency.

17 When did you hire Guidepost Solutions?

18 MR. HARRISON: Objection to the form of the
19 question. Compound. Testifying.

20 But you can try and answer.

21 THE WITNESS: I don't -- I don't recall.

22 BY MS. RICHARDSON:

23 Q. Did you recall --

24 A. I don't recall.

25 Q. Did you hire Guidepost Solutions prior to 2022?

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1 A. I -- I don't recall exactly. I don't --

2 Q. Did Guidepost Solutions help you with the lost
3 NFTs?

4 A. I think --

5 MR. HARRISON: With what? I'm sorry?

6 MS. RICHARDSON: The lost NFTs, the Trezor
7 wallet.

8 THE WITNESS: I -- I don't remember them
9 helping with that.

10 BY MS. RICHARDSON:

11 Q. Okay. But when I received a demand letter from
12 your attorneys in June of 2022, Guidepost Solutions at
13 that point had been retained; correct?

14 A. Around that time, I believe.

15 Q. Okay. And approximately how much would you say
16 you have paid Guidepost Solutions?

17 MR. HARRISON: Objection.

18 THE WITNESS: I mean, I can answer it easily
19 but --

20 BY MS. RICHARDSON:

21 Q. Yeah.

22 A. I don't know.

23 MR. HARRISON: Do you know? Okay.

24 THE WITNESS: I don't know. I --

25 ///

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1 BY MS. RICHARDSON:

2 Q. Have you paid them more than a million dollars?

3 MR. HARRISON: Objection.

4 THE WITNESS: I don't know.

5 BY MS. RICHARDSON:

6 Q. Have you paid them more than \$5 million?

7 MR. HARRISON: Objection. That's privileged
8 information, so I'm directing you not to answer.

9 MS. RICHARDSON: It's -- it's not privileged
10 information.

11 MR. HARRISON: It is privileged information.

12 MS. RICHARDSON: Are you -- you're telling the
13 client not to answer that question --

14 MR. HARRISON: Yes.

15 MS. RICHARDSON: -- so we're clear on the
16 record?

17 MR. HARRISON: Yep.

18 MS. RICHARDSON: Okay. I want to reserve
19 rights to compel that information.

20 THE WITNESS: And I can answer it easy, if you
21 want.

22 MR. HARRISON: Go ahead.

23 THE WITNESS: I don't remember. I don't know.

24 BY MS. RICHARDSON:

25 Q. Okay.

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1 A. No idea.

2 Q. Were you aware that Guidepost communicated with
3 a number of my family members on your behalf?

4 MR. HARRISON: Objection.

5 So those are privileged communications with
6 Guidepost Solutions; so to the extent that the answer
7 would require you to reveal privileged communications
8 between yourself and Guidepost, for instance, about what
9 Guidepost did, then I'm instructing you not to answer
10 that.

11 MS. RICHARDSON: Can you explain the privilege
12 basis for Guidepost.

13 MR. HARRISON: Sure. That's privileged. It's
14 a privileged --

15 MS. RICHARDSON: Based on --

16 MR. HARRISON: -- relationship.

17 MS. RICHARDSON: Based on -- on what?

18 MR. ANDRE: Ms. Richardson, Guidepost has been
19 operating at the direction of counsel and, therefore, is
20 covered by our attorney-client privilege.

21 MS. RICHARDSON: Okay. That's what I needed to
22 hear. Thank you.

23 BY MS. RICHARDSON:

24 Q. So did -- did -- Ms. Thomson, was Guidepost
25 retained by you directly or by your counsel?

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1 MR. HARRISON: Objection.

2 But you can -- you can answer, if you know.

3 THE WITNESS: I don't believe I retained them
4 myself directly.

5 BY MS. RICHARDSON:

6 Q. But you don't remember; correct?

7 MR. ANDRE: Objection. Asked and answered.

8 MR. HARRISON: Asked and answered.

9 BY MS. RICHARDSON:

10 Q. Are you aware that representatives from
11 Guidepost went to the homes of my family members?

12 MR. HARRISON: Objection to the extent that it
13 call -- would require you to reveal privileged
14 information, for instance, your communications with any
15 personnel from Guidepost or from the law firm of
16 McDermott Will & Emery, upon which you may have based
17 any information or knowledge, then I'm directing you not
18 to answer. If you can answer without revealing
19 privileged information, then you can go ahead and try
20 and answer.

21 BY MS. RICHARDSON:

22 Q. Are you aware of any communications between
23 yourself and your firm with my half-sister, Jennifer
24 [phonetic] Richardson?

25 MR. HARRISON: I'm sorry. Her firm? Is that

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1 what you said?

2 MS. RICHARDSON: I'm sorry. Not firm.

3 Representatives.

4 MR. HARRISON: I'm sorry. Can you just repeat
5 the question or have it read back.

6 BY MS. RICHARDSON:

7 Q. Yes. Are you aware of communications or
8 dealings with my half-sister, Jennifer Richardson,
9 between yourself directly or any representatives?

10 MR. HARRISON: Okay. So it's the same
11 objection based on privileged information.

12 If the -- if your answer would require you to
13 reveal privileged information, for instance,
14 communications you had with anyone from Guidepost or
15 anyone from McDermott in which you learned any
16 information that would -- that would be part of your
17 answer, then I'm directing you not to answer on the
18 basis of privilege. If you can answer it without
19 revealing any privileged communications, then you could
20 try your best to answer it.

21 BY MS. RICHARDSON:

22 Q. It was printed in a magazine article that
23 representatives from Guidepost Solutions went to the
24 home of my mother and my stepsister.

25 Did you read that?

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1 A. No.

2 Q. No.

3 Guidepost Solutions has been retained to create
4 a number of expert reports; is that correct?

5 MR. HARRISON: Objection. Assumes facts not in
6 evidence.

7 I don't believe that's correct but --

8 MR. ANDRE: To the extent you can answer -- to
9 the extent you can answer without basing your answer on
10 conversations you had with Guidepost or your counsel,
11 you can do so. Otherwise, we'd instruct you not to
12 answer the question off the basis of the attorney-client
13 privilege.

14 BY MS. RICHARDSON:

15 Q. So are you choosing not to answer?

16 A. I can't answer the question. It's privileged.

17 MS. RICHARDSON: I just want to state on the
18 record that I reserve rights to compel any information
19 with Guidepost Solutions.

20 THE WITNESS: Excuse me.

21 BY MS. RICHARDSON:

22 Q. Do you agree that our current financial
23 situations are very different from one another?

24 MR. HARRISON: Objection. Vague. Calls for
25 speculation.

1 BY MS. RICHARDSON:

2 Q. You still have to answer.

3 A. I don't -- I don't know your financial
4 situation, so I would hazard to guess that it's
5 probably -- there is some disparity there.

6 Q. And is it fair to say that you have far more
7 resources than I do in these legal proceedings?

8 MR. HARRISON: Objection to the form of the
9 question. Vague.

10 It's a completely improper question but --

11 BY MS. RICHARDSON:

12 Q. Are you aware -- are you aware that I'm
13 representing myself in this litigation?

14 A. Yes.

15 Q. Do you know how many lawyers are working on
16 your behalf currently?

17 A. I've never counted them exactly, no.

18 Q. The lawyers that I have dealt with -- and I
19 just want to confirm if you're aware of these lawyers
20 directly -- are Todd Harrison, Julian Andre, Josh Yim,
21 and Joseph Evans, in addition to a number of other
22 associates. Are -- those are only in the United States.

23 Are you -- are you familiar with -- with those
24 attorneys?

25 A. Not all of them.

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1 Q. Okay. So I received communications from all
2 those attorneys on your behalf.

3 Are you aware of that?

4 A. No.

5 Q. Okay.

6 A. I'm not --

7 MR. ANDRE: I -- to the extent you have
8 independent knowledge outside of discussions you've had
9 with us, you could answer the question. If the question
10 would result -- would require you to disclose
11 confidential communications you had with your attorneys,
12 we'd instruct you not to answer the question on the
13 attorney-client privilege.

14 BY MS. RICHARDSON:

15 Q. It's fair to say you have a number of attorneys
16 assisting you in this matter; correct?

17 MR. HARRISON: Objection. Vague.

18 You can try and answer.

19 THE WITNESS: There -- I do have a few
20 attorneys, yes.

21 BY MS. RICHARDSON:

22 Q. And Guidepost Solutions is a security firm that
23 you have also retained to help you -- or that your
24 counsel has retained that has been helping you in the
25 process of this litigation; correct?

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1 MR. HARRISON: Again, we're not waiving
2 attorney-client privilege; so if you could answer
3 without violating attorney-client privilege in any way,
4 go ahead and do your best.

5 THE WITNESS: They've been hired -- the
6 question is, have they been hired in this --

7 BY MS. RICHARDSON:

8 Q. Uh-huh. I mean, they're here today, are they
9 not?

10 A. Yeah. Guidepost -- Guidepost has been hired.

11 Q. Right. Okay.

12 And you also hired a very -- a fairly sizable
13 PR management team to protect your interest; is that
14 correct?

15 MR. HARRISON: Objection to the compound nature
16 of the question. Vague.

17 BY MS. RICHARDSON:

18 Q. You retained the services of a PR company;
19 correct?

20 MR. HARRISON: Objection.

21 To the extent that you know. And I'm
22 instructing you that to the extent your answer would
23 invoke --

24 THE WITNESS: Yeah.

25 MR. HARRISON: -- attorney-client privilege,

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1 then I'm directing you not to answer it. If you could
2 answer it without getting any into conversations you had
3 with McDermott or anyone at the PR firm that's covered
4 by attorney-client privilege, then I'm instructing you
5 not to answer. But you can answer without impinging on
6 that.

7 THE WITNESS: Privilege.

8 BY MS. RICHARDSON:

9 Q. It's -- your PR firm you're alleging is --
10 you're suggesting is privileged information?

11 A. (No audible response.)

12 Q. So -- so you are saying you're not going to
13 reveal that you hired a PR firm or who that PR firm is;
14 is that correct?

15 MR. HARRISON: Objection. That's a compound
16 question. Assumes facts not in evidence.

17 That's what she said even in her prior answer.

18 BY MS. RICHARDSON:

19 Q. Have you retained a PR firm, Ms. Thomson?

20 MR. HARRISON: Are you asking her in -- in her
21 personal capacity if she's retained a PR firm or --

22 MS. RICHARDSON: Yes.

23 MR. HARRISON: -- asking if her lawyers have
24 retained a PR firm?

25 MS. RICHARDSON: I'm asking in her personal

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1 capacity.

2 THE WITNESS: No.

3 MR. HARRISON: That's okay. That's fine.

4 BY MS. RICHARDSON:

5 Q. No. Are you aware that a PR team has been
6 working on your behalf?

7 MR. HARRISON: Objection to the "on your
8 behalf."

9 Again, if you can answer without violating
10 attorney-client privilege based on any communications or
11 advice that you've been given from McDermott or the PR
12 firm, then you can try and answer it.

13 THE WITNESS: No, I can't. Privilege.

14 MS. RICHARDSON: Okay. I reserve the right to
15 compel information about the PR company that was
16 retained on behalf of Taylor Thomson.

17 BY MS. RICHARDSON:

18 Q. I want to go back for a moment to April of
19 2022, after I saw you at my home and I came to see you
20 in Malibu, which is -- and I came to see you in Malibu.

21 Do you remember this?

22 A. I didn't recall it was Malibu. I thought you
23 came to Santa Monica.

24 Q. It was Malibu.

25 A. Oh.

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1 Q. You were getting ready to go to Coachella, I
2 believe, that day.

3 Does that sound familiar?

4 A. I'd have to look at a calendar.

5 Q. I came to your home, and you were on the phone
6 with Justin at the time, and you were upset because he
7 had missed an auction item.

8 Do you have a memory of that?

9 MR. ANDRE: Objection. Vague. Compound.

10 Also, again, Ms. Richardson, you're testifying.
11 You're not asking questions.

12 BY MS. RICHARDSON:

13 Q. Do you remember that when I came to your house
14 to give you the wallets, you were on the phone?

15 MR. ANDRE: Objection. Vague.

16 THE WITNESS: No.

17 BY MS. RICHARDSON:

18 Q. Okay. Do you remember that when I gave you
19 those wallets, I informed you about a ADAM staking
20 opportunity that Persistence had that had a yield in
21 ADAM on the Terra chain?

22 MR. ANDRE: Objection. Vague. Compound.

23 Again, Ms. Richardson, I'd ask you to ask
24 questions, not try to testify.

25 ///

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1 BY MS. RICHARDSON:

2 Q. Do you remember discussing with me --

3 A. No.

4 Q. -- Persistence's new partnership with ADAM and
5 Terra during that visit?

6 A. No.

7 Q. No.

8 Do you remember directing me to stake a portion
9 of your ADAM with your Ethereum that day?

10 A. I remember there was one last request to
11 something.

12 Q. Yeah.

13 A. That is most likely what it would have been.

14 Q. And do you remember that because of that
15 request, I kept two of the wallets and executed those
16 trades after that meeting?

17 MR. ANDRE: Objection. Vague and compound.

18 BY MS. RICHARDSON:

19 Q. Do you remember that in order to execute those
20 trades, I had to keep two wallets?

21 MR. ANDRE: Same objection. Vague. Compound.
22 Misstates prior testimony. Assumes facts.

23 BY MS. RICHARDSON:

24 Q. I kept two wallets to execute those trades, and
25 Michelle returned them to your Santa Monica home.

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1 Do you remember that?

2 MR. ANDRE: Same objections.

3 MS. RICHARDSON: You -- it's fine. Objections
4 are noted.

5 THE WITNESS: They were returned, my
6 understanding; but it was not to me.

7 BY MS. RICHARDSON:

8 Q. To Esztella?

9 A. I believe they were returned -- yeah, they were
10 returned.

11 Q. And also, I didn't return them; so I feel like
12 neither of us can totally answer that correctly.

13 A. Yeah. Yeah.

14 Q. I want to go back for a moment to the
15 accounting portion and helping you find an accountant.
16 I -- sorry. It's very hard later in the day to get
17 these sentences right, so hats off to you guys for doing
18 this all the time. It's like you have to take a
19 sentence upside and down and inside out, but it's a
20 skill which I clearly don't have yet.

21 I understand that you have alleged you were not
22 aware of a potential finder's fee. That's correct?

23 MR. HARRISON: Objection. Just testifying
24 again. I mean --

25 MR. ANDRE: Form. Compound. Vague.

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1 MS. RICHARDSON: Oh, God. This is how we're
2 going to go. Okay.

3 I'm not going to change it, so you can answer
4 it as is.

5 MR. ANDRE: If you understand the question.

6 THE WITNESS: To clarify --

7 BY MS. RICHARDSON:

8 Q. You've stated --

9 A. -- I was not aware that there -- that you had
10 taken a finder's fee that was embedded in the \$5 token
11 price, no.

12 Q. And based on that understanding, you believed
13 that it was warranted that I spend my time trading for
14 you without the prospect of other opportunities?

15 MR. HARRISON: Objection to form. Calls for
16 speculation. Assumes facts not in evidence.

17 THE WITNESS: My understanding was that you
18 were excited do it because you were -- you were excited
19 for opportunities and it also wasn't meant to be a big
20 deal. You said you were doing it all day long for
21 yourself and so it would not be anything -- you'd be
22 honored and happy to be part of it and that you would --
23 because of, I guess, the size of some of the purchases,
24 that you would -- that it would move you into a sphere
25 where you might have opportunities in that space, which

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1 is a space I understood you really wanted to be in
2 professionally.

3 BY MS. RICHARDSON:

4 Q. So -- so your belief is based on the
5 opportunity that I was getting from the experience, it
6 warranted the time spent; correct?

7 MR. HARRISON: Objection. Vague. Misstates
8 her prior testimony.

9 BY MS. RICHARDSON:

10 Q. Okay.

11 A. Yeah.

12 Q. I'm going to -- I'm going to totally go in a
13 different direction for a moment and -- and just kind of
14 move through things rather quickly.

15 You routinely travel by private jet; correct?

16 A. No.

17 Q. In the past have you traveled by private jet?

18 A. On occasion.

19 Q. Okay. And you have chartered a number of
20 yachts; is that correct?

21 A. That is correct.

22 Q. Okay. And those yacht charters happened
23 primarily in -- in Europe and the Caribbean; correct?

24 A. Not only. But primarily, yes.

25 Q. Okay. What other areas did you do yacht

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1 charters?

2 A. The North Pole.

3 Q. Oh, right.

4 A. North Pole, yeah. Yeah.

5 Q. And I want to ask you for a moment if you
6 remember in 2021, when Madeleine was thinking about
7 buying a house, that we started working on a budget
8 spreadsheet for you and for Madeleine.

9 A. I don't recall.

10 MR. HARRISON: Wait. Wait. Wait. There is no
11 question. No question has been posed.

12 MS. RICHARDSON: If we started working on a
13 budget spreadsheet for you and Madeleine.

14 MR. HARRISON: That's half of a question.

15 BY MS. RICHARDSON:

16 Q. Do you have memory --

17 A. I don't recall --

18 Q. -- of us creating a spreadsheet?

19 A. I don't recall us working on a budget.

20 Q. Okay. Do you -- you mentioned that you are now
21 a partial owner of a number of properties.

22 Were you previously the sole owner of those
23 properties?

24 MR. HARRISON: Objection. Vague.

25 No one knows what you're talking about at this

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1 point.

2 BY MS. RICHARDSON:

3 Q. When we talked earlier about the homes that you
4 own, you said that you only own one home in Los Angeles;
5 correct?

6 A. Yes.

7 Q. Isn't it also correct that you purchased a home
8 in Malibu in -- on or about twenty -- 2010?

9 A. Yes. But it wasn't just -- that wasn't solely
10 me. That wasn't me personally.

11 Q. Okay.

12 A. It wasn't me personally.

13 Q. Oh, I see. Okay.

14 A. Yeah.

15 Q. And then -- and -- and if it wasn't you
16 personally, does that mean it belongs to you and your
17 daughter?

18 MR. HARRISON: Objection. Form. Vague.

19 MS. RICHARDSON: Is there --

20 MR. HARRISON: You can try --

21 THE WITNESS: Should I answer it?

22 MR. HARRISON: You can -- I mean, it's a
23 completely irrelevant personal question.

24 THE WITNESS: Yeah. It's complicated. Me
25 myself --

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1 MR. HARRISON: You can try to answer it.

2 THE WITNESS: Myself, my daughter, future
3 generations. It's --

4 BY MS. RICHARDSON:

5 Q. It would be your family branch?

6 A. Yeah, it's just our branch. Yeah, it's our
7 branch.

8 Q. And your family branch as of today is --
9 consists of you and your daughter; correct?

10 A. Correct.

11 Q. Okay. And do you and your daughter share
12 any other homes in Los Angeles?

13 MR. HARRISON: I'm actually just going to
14 remind you not to answer if the answer that you would
15 give is based on privileged communications that you had
16 with any lawyers that have set up whatever structures
17 we're talking about here. If -- if -- so --

18 THE WITNESS: Yeah.

19 MR. HARRISON: But if you can answer without
20 revealing any privileged information that you got from
21 lawyers about the structures that have been set up, then
22 you can try to answer it, to the best of your ability.

23 THE WITNESS: Can you ask it again, please.

24 BY MS. RICHARDSON:

25 Q. Yes. Do you have other homes in Los Angeles

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1 that you and your daughter own together?

2 MR. HARRISON: Same instruction.

3 THE WITNESS: Yeah.

4 BY MS. RICHARDSON:

5 Q. I'm not asking --

6 A. It's privilege --

7 Q. -- where they are. I'm saying, do you have
8 other homes that you own in -- in Los Angeles?

9 MR. HARRISON: Objection. Vague.

10 MR. ANDRE: Also calls for a legal conclusion.

11 BY MS. RICHARDSON:

12 Q. Okay. Let's try this.

13 Did you purchase a home on Tigertail that you
14 currently own?

15 MR. HARRISON: Objection -- objection -- same
16 objection. Vague. Calls for a legal conclusion.

17 MS. RICHARDSON: A purchase of a home calls for
18 a legal conclusion?

19 MR. HARRISON: Yeah. Again, same instruction
20 that if the answer were to impinge upon any
21 attorney-client privileged communications or information
22 that you have received regarding -- I don't even know --
23 the structure of the house, the structure of ownership
24 of the house --

25 MS. RICHARDSON: Counsel, are you --

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1 MR. HARRISON: I'm not done talking.

2 MS. RICHARDSON: Okay.

3 MR. HARRISON: -- regarding the structure of
4 the ownership of the house, then I'm instructing you not
5 to answer on the basis privilege. If, however, you can
6 somehow answer the question without violating
7 attorney-client privilege, then give it your best shot.

8 THE WITNESS: Technically -- technically
9 privileged.

10 MS. RICHARDSON: So I want to make sure that
11 the record is clear that the -- Ms. Thomson and her
12 attorneys are stating that she is not going to answer
13 the questions about her real estate ownership based on
14 privilege, and I'm going to reserve the right to compel
15 that information at a later time.

16 MR. ANDRE: I'll just respond that you can try
17 to answer [sic] the question in a way that would not
18 require her to disclose privileged information. You're
19 choosing not to do so.

20 MS. RICHARDSON: I asked if she owns any
21 additional properties -- if -- okay. I'm not choosing.
22 Would counsel mind telling me where the privilege is in
23 that question?

24 MR. HARRISON: We're not here to advise you.

25 MS. RICHARDSON: Okay. That's fine.

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1 MR. HARRISON: You do whatever you want to do.
2 You know, this is completely irrelevant, which is the
3 point, so --

4 MS. RICHARDSON: It's actually not.

5 MR. HARRISON: Okay.

6 MS. RICHARDSON: There's a number of questions
7 in relation to your personal wealth that you have not
8 answered today, and I want to state for the record that
9 I am reserving rights to compel that information.

10 BY MS. RICHARDSON:

11 Q. You said that you reached out to Persistence in
12 2022 and at that time you sent text messages to Shiro
13 Gutzie saying that I had lied to you and that I hid the
14 fees. Do you remember that?

15 MR. ANDRE: Objection. Misstates testimony.
16 Compound.

17 BY MS. RICHARDSON:

18 Q. Do you remember sending text messages to Shiro
19 that alleged that I had lied to you in or about the
20 summer of 2022?

21 A. Yes. I didn't -- I didn't use the word "lie."
22 I don't remember what I said. I basically texted him to
23 say that you had taken a hidden fee, which is also, I
24 assume, a secret kickback.

25 Q. Do you remember sending an email to a number of

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1 your accounting and financial representatives where you
2 called me a cunt and a liar in the -- on -- in or about
3 the summer of 2022?

4 A. I don't recall those emails. Have to pull them
5 and show them, if you have them.

6 Q. I believe they were produced for the Singapore
7 arbitration.

8 A. If they were produced, then they were produced
9 and they exist.

10 MR. HARRISON: Do you have them here today?

11 MS. RICHARDSON: I don't have them here today,
12 no.

13 MR. HARRISON: Okay. Is it your position now,
14 just so we're clear -- because you complained about the
15 use of information and documents from the Singapore
16 arbitration before, but I take it now your position is
17 it's okay to use those.

18 MS. RICHARDSON: I complained about the use of
19 the materials obtained from the Singapore arbitration
20 for the purposes of slander in the media, not for the
21 purpose of a deposition. I believe that -- that counsel
22 used a number of -- of pieces of evidence from the
23 Singapore arbitration in our litigation, which I've
24 never disputed; and what I did dispute was improperly
25 procuring evidence and giving it to a reporter before it

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1 was on the public record.

2 MR. HARRISON: I -- go ahead. If you can --
3 you go first.

4 MR. ANDRE: I'm trying to understand briefly
5 which -- which reporter or -- actually, never mind.
6 Just continue.

7 MR. HARRISON: So you think you can use this --
8 the information and documents from the Singapore
9 arbitration but nobody else can? Is that your position?

10 MS. RICHARDSON: My position is that
11 information given to the press that was obtained through
12 discovery is an improper use and that it's not a public
13 record.

14 MR. ANDRE: What's your basis to assert that?

15 MS. RICHARDSON: My basis to assert improper --
16 it's improper to disseminate information from discovery?

17 MR. ANDRE: What's your basis to allege that
18 information from the arbitration has been disseminated
19 to the press by -- particularly by -- by -- by someone
20 other than yourself?

21 MS. RICHARDSON: Well, it was either obtained
22 through -- through discovery purposes of me or it was
23 obtained through discovery purposes of the Singapore
24 arbitration. I know that the text messages between --
25 this is probably not the -- not the proper forum to be

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1 having this discussion, I don't think. But --

2 MR. HARRISON: Well, it's certainly a simple
3 question. Like, are you -- do you object to the use of
4 documents and information from the Singapore
5 arbitration? That's previously as I understood your
6 position, but you're using that stuff --

7 MS. RICHARDSON: That was never my position.

8 MR. HARRISON: Okay. Great.

9 MS. RICHARDSON: My position was improper use
10 of disseminating information obtained through discovery
11 and giving it to the media. That was -- that was my
12 position. It's my position today. It was always my
13 position. If you go back and review any issue I had,
14 that was the issue.

15 MR. ANDRE: So -- okay.

16 MS. RICHARDSON: That was the issue.

17 MR. HARRISON: Don't really know exactly what
18 your position is, but let's keep going.

19 MR. ANDRE: I think we need to move forward.

20 MS. RICHARDSON: We do need to move forward.

21 BY MS. RICHARDSON:

22 Q. I want to continue for a moment on this topic
23 of information about me, which was -- obviously, you
24 know, it's a pretty extreme use of words to be using
25 to -- you know, especially in a professional capacity.

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1 Can you elaborate on who else you might have
2 told at that time. Because right now we've talked about
3 Shiro Gutzie; we've talked about your financial
4 professionals; and we've also talked a little bit about,
5 you know, Kevin and Rand and certainly Ron, who -- and
6 Madeleine.

7 MR. ANDRE: Objection. Vague. Ambiguous.
8 Compound. Misstates testimony. Misstates the record
9 and, frankly, is unintelligible.

10 MS. RICHARDSON: That's fine. That's probably
11 fair at this point in the day.

12 BY MS. RICHARDSON:

13 Q. Do you remember having conversations about me
14 to others?

15 MR. ANDRE: Objection. Vague.

16 BY MS. RICHARDSON:

17 Q. Did you have conversations with me -- did you
18 have conversations about the allegations you have
19 against me with Jack Kilgore?

20 MR. HARRISON: Still objection. Vague.

21 MS. RICHARDSON: And I'm going to keep that
22 one --

23 MR. HARRISON: You can try to -- you can try to
24 answer it the best of your ability.

25 THE WITNESS: Anybody that I spoke to would

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1 have been in context of them asking because it's -- it's
2 now been published. I mean, it's publicly --

3 BY MS. RICHARDSON:

4 Q. So are you --

5 A. -- claimed.

6 Q. So the text messages, for example, that you
7 sent to Shiro Gutzie were sent in July of 2022.

8 A. That was, I believe, the day --

9 MR. ANDRE: Hold on.

10 Objection. Misstates the testimony.

11 Are you showing her -- are you going to
12 show her that -- you said you didn't have the text
13 messages with you.

14 MS. RICHARDSON: I am -- I -- let me ask the
15 question.

16 MR. ANDRE: I'm asking you, do you have the
17 text messages with you --

18 MS. RICHARDSON: I heard your objection. I
19 heard your objection.

20 MR. HARRISON: No. But he's asking you as part
21 of the objection --

22 MS. RICHARDSON: I do not, but that's not --
23 that's not relevant.

24 MR. ANDRE: No. It actually -- and for the
25 record, it actually is relevant. You are representing

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1 what a document says without showing her and giving her
2 an opportunity to review the document.

3 MS. RICHARDSON: I understand.

4 MR. ANDRE: And so if you would like her to
5 comment on a particular document, we would request that
6 you show her the document so that she can review it. If
7 you're not willing to do that, I'm going to object on
8 the basis that it misstates the evidence in this case --

9 MS. RICHARDSON: Counsel --

10 MR. ANDRE: -- and is vague and ambiguous.
11 That's what I'm --

12 MS. RICHARDSON: Counsel, I -- your client has
13 already confirmed that she remembers sending that
14 information to Shiro Gutzie in July of 2022.

15 MR. ANDRE: I don't believe she actually did
16 that.

17 THE WITNESS: No, I didn't.

18 MR. ANDRE: It wasn't a proper question, and we
19 objected to the question at the time, so I'm putting my
20 objection on the record here. If you would like her to
21 comment on documents, you need to show them to her and
22 she needs to an opportunity to review them. Otherwise,
23 I will stand on my objection that you're misstating
24 those records because she has not had an opportunity to
25 review them, I do not have an opportunity to review

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1 them, and Mr. Harrison does not have an opportunity to
2 review them.

3 MS. RICHARDSON: I am asking you if you are
4 instructing --

5 MR. ANDRE: I'm not.

6 MS. RICHARDSON: -- the witness not to answer.

7 MR. ANDRE: I am not instructing the witness
8 not to answer.

9 MS. RICHARDSON: Okay.

10 MR. ANDRE: But I am pointing out that you are
11 asking her about documents you are failing to give her
12 an opportunity to review, and I'm objecting on that
13 basis along with the other bases I've stated on the
14 record.

15 And I apologize for speaking too fast,
16 Ms. Court Reporter.

17 MS. RICHARDSON: Thank you.

18 BY MS. RICHARDSON:

19 Q. And it's -- it's all documented now,
20 Ms. Thomson; so I want to remind you, this is not a
21 privileged question; and you are obligated to give an
22 answer.

23 A. And the question is --

24 MR. HARRISON: If you can.

25 MS. RICHARDSON: The question is -- I just said

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1 the text messages sent to Shiro was July 2022, and you
2 were just about to say something before counsel
3 interrupted. You said that was just before --

4 MR. ANDRE: Preserve same objections, please.

5 THE WITNESS: But --

6 MS. RICHARDSON: Yes.

7 MR. ANDRE: Yes.

8 THE WITNESS: I answer?

9 MR. ANDRE: To the best -- if you can --

10 THE WITNESS: To the best of my knowledge -- I
11 don't -- I remember it was July. It was -- it was
12 pretty swiftly after we found out from Tushar that you
13 were taking a hit -- a secret -- a secret commission or
14 hidden kickback.

15 BY MS. RICHARDSON:

16 Q. An alleged secret kickback, yes. I understand.
17 And --

18 A. That was --

19 Q. And is that what you were referring to when you
20 said just after? Okay?

21 A. Yes. Yeah. That's what -- that's what I
22 recall was the gist of it. Because I was so shocked to
23 find that out. I was --

24 Q. Right.

25 A. Really sideswiped me, so that's why.

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1 Q. Okay. And during this time --

2 A. I think -- I believe I said -- I think
3 disingenuous --

4 Q. That sounds --

5 A. -- or seemed -- for someone taking a secret
6 kickback almost a million dollars and professing all
7 along that they were getting nothing out of it when I
8 did my deal. That seems disingenuous to me.

9 Q. Once again, I would like to ask you if you have
10 ever obtained any evidence that I received anything at
11 any time from the transactions that took place.

12 MR. HARRISON: Objection. Vague.

13 BY MS. RICHARDSON:

14 Q. Are you aware that your claims against me at
15 this point are allegations that have yet to be proven?

16 MR. HARRISON: Objection. Calls for a legal
17 conclusion. It's vague.

18 MS. RICHARDSON: I will stand with the
19 question.

20 THE WITNESS: The hidden commission is, my
21 understanding, based on the fact that you had -- it was
22 written no -- nowhere. It did not incorporate -- it was
23 not incorporated into my arrangement. And so my
24 understanding was that I was given the best price at \$5,
25 and it was not the case because 6 cents of that per

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1 token were -- actually had been arranged to be
2 ultimately controlled by you and in your wallet because
3 they were a commission to you.

4 BY MS. RICHARDSON:

5 Q. And is it --

6 A. That, to me, seems like it's a commission.

7 Q. Is it fair to say if somebody has a potential
8 upside to be realized at the end of a period of time,
9 that commission does not belong to them?

10 MR. ANDRE: Objection.

11 MR. HARRISON: Objection. Vague. Compound.
12 Calls for, I suppose, a legal conclusion.

13 MS. RICHARDSON: Understood.

14 MR. ANDRE: And improper hypothetical.

15 BY MS. RICHARDSON:

16 Q. Okay. I'm going to stand with the question.

17 So do you understand the question, or would you
18 like me to rephrase it?

19 A. My understanding is that you're saying just
20 that it -- you're -- no, actually. Can you rephrase it.

21 Q. Sure. If an individual never realizes or takes
22 a -- personally takes or liquidates funds that were set
23 aside and those funds go back into the -- how do I put
24 this?

25 Do you believe if I never realized any profit

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1 monetary or otherwise, from this transaction, that I
2 received a, what you call, secret kickback?

3 MR. HARRISON: Objection. Compound.
4 Argumentative. Vague.

5 THE WITNESS: My understanding is it's very
6 straightforward. Secret kickback was just that it was
7 not put in writing, it wasn't part of the deal, and your
8 arrangement with Tushar was to specifically withhold it
9 from the contract that I was going to sign and have the
10 proceeds sent directly to you; and that was -- that was
11 the deal. It's nothing to do with whether it
12 was realized -- it's not -- or not. It's whether it
13 was -- it was taken.

14 BY MS. RICHARDSON:

15 Q. And you believe it was taken because -- can you
16 tell me why you believe it was taken.

17 A. Why you negotiated it? Because you --

18 MR. HARRISON: Objection --

19 THE WITNESS: Because you wanted it.

20 MR. HARRISON: Just a second.

21 Objection. Vague.

22 You can go ahead and try and answer.

23 THE WITNESS: I mean, I -- I -- I'm only -- I
24 mean, I would be guessing. My assumption is that if
25 you -- that by negotiating a hidden fee or a secret

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1 commission, it's because that's what you wanted.

2 BY MS. RICHARDSON:

3 Q. Okay. We're going to totally switch lanes for
4 a minute and just go through a couple of questions
5 pertaining back to your staff and Mike Foss.

6 In your Malibu home and your Bel Air home, you
7 had relatively extensive video surveillance; is that
8 correct?

9 MR. HARRISON: Objection. Compound. Vague.

10 You can try and answer.

11 BY MS. RICHARDSON:

12 Q. In your Malibu home you had video surveillance;
13 correct?

14 A. No. In the -- in my homes, they all have
15 cameras. They all have cameras in certain areas, and
16 all staff know. That's just a fact.

17 Q. And are there also recording devices?

18 A. No.

19 Q. Okay. And do you remember --

20 MR. HARRISON: Objection. Vague to that last
21 question.

22 BY MS. RICHARDSON:

23 Q. Okay. In or around early 2021 you terminated
24 Dora's employment.

25 Do you remember that?

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1 MR. ANDRE: Objection. Vague.

2 THE WITNESS: Dora was one of our past
3 housekeepers.

4 BY MS. RICHARDSON:

5 Q. And do you remember telling me that you
6 believed she had -- she was working two jobs?

7 A. She admitted it. She told us, and it was
8 obvious because she was calling in sick and not showing
9 up for work when I would come back into town, so -- but
10 she admitted it herself.

11 Q. Do you remember telling me that you couldn't
12 tell her why she was being terminated because you
13 couldn't tell her how you got that information?

14 MR. HARRISON: Objection --

15 THE WITNESS: No.

16 MR. HARRISON: -- vague.

17 Objection. Vague.

18 And you --

19 THE WITNESS: And it's also --

20 MR. HARRISON: Again, this is -- I'm just --
21 Ms. Richardson, we've talked about this many times
22 before and we warned you many times before. This has
23 nothing to do with this case. Okay? And it's just an
24 attempt to harass and intimidate and sounds like make
25 stuff up about my client. So at some point -- I'm not

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1 directing her to not answer now, but at some point it's
2 just going to be --

3 MS. RICHARDSON: I heard -- I heard --

4 THE WITNESS: I can answer.

5 Ms. Richardson's -- she's confused.

6 She actually let it slip to one of my -- one of
7 my other staff her other job, at which point it made
8 sense because when I came into town, she would work a
9 day or so and then she would call in sick and then she
10 kept calling in sick and she just wasn't coming to work.
11 It's because she had another full-time job.

12 BY MS. RICHARDSON:

13 Q. Okay.

14 A. Because I was living out of the country, and so
15 she didn't -- she should have showed up, but she didn't.

16 Q. And after Dora's termination you hired Raquel
17 to manage your Los Angeles properties; correct?

18 A. I don't remember if she was the next one, but
19 Raquel did -- did work for me at one point.

20 Q. Okay. When you learned that Raquel was
21 pregnant, you were upset about that.

22 Do you remember?

23 A. I was -- I wouldn't say I was -- I was
24 displeased that she had not disclosed during her
25 interview because it would most likely have possibly had

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1 a bearing on whether I would hire her as my only
2 full-time employee because she was, as she did, planning
3 on just checking out of work pretty fast.

4 Q. Right. And --

5 A. So if I'd known that, I would have looked for
6 someone who was going to be available more than two
7 months.

8 Q. And when Raquel came on board, right about that
9 time you had just gotten the new Santa Monica home and
10 were in the process of selling your Bel Air home; is
11 that correct?

12 MR. HARRISON: Objection. Compound.

13 THE WITNESS: I don't remember the actual date.
14 I mean, I don't recall exactly, no.

15 BY MS. RICHARDSON:

16 Q. And at that time you also had the Malibu
17 property to manage.

18 Would that be reasonable?

19 A. Yes. I was primarily in Malibu at that time.

20 Q. And do you remember that Raquel was
21 hospitalized during this period due to a complication
22 with her pregnancy?

23 A. At some point during her tenure, she said she
24 went to the hospital and then she had a doctor's note
25 for the rest of her -- rest of her the duration right